

Last updated: February 21, 2019

## **We value privacy, especially yours**

At Asurion, we take protecting your privacy seriously. In order for our sites, products, and services (collectively “services”) to function properly, we need to collect and use some of your personal information. We comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and want you to understand what personal information we collect and how it is used.

This policy is incorporated as part of the Terms of Service that apply to your use of the services. When you use our services, you acknowledge that you have accepted the Terms of Service and this policy without exception. You also acknowledge that you consent to our privacy practices, including our use and disclosure of your personal information.

If you do not consent to the Terms of Service or this policy, please do not use our services or provide any personal information.

## **What’s covered by this policy**

Any Asurion-affiliated site, product or service which links to this policy and any collection, storage, transfer, sharing, disclosure and handling of your personal information when you use our services which we define below.

This Policy does not cover and we are not responsible for third-party sites or applications that may be linked from our sites; linking to them does not imply an endorsement. We are not responsible for these sites or applications or any information they may collect. You should always review the privacy policy of any third-party site or application.

## **Personal information we collect**

When you use our services, we may collect the below types of personal information:

- Name;
- Mailing address;
- Email address;
- Cell phone number;
- Information that identifies your mobile device, such as Electronic Serial Number ("ESN") or International Mobile Equipment Identity ("IMEI") data;
- Device serial number and media access control ("MAC") address;
- Information collected after obtaining your permission during your use of the site, product or service;
- Any information that you provide as part of filing a claim;
- Other information that personally identifies you or is linked or linkable to you.

As part of the claim process, Asurion or its affiliates may require you to provide a copy of your driver’s license, passport, military ID, or other personal identification card. Additionally, in order to process your claim, Asurion or its affiliates may request your

shipping and billing information, credit card information or other preferred payment means.

Asurion and its partners use cookies or similar technologies to analyze trends, administer the site, track users' movements around the site, and to gather demographic information about our user base as a whole.

Asurion also gathers certain information about the use of Asurion's services, including the number of unique visitors, the frequency of visits, how users interact with the sites, user experience preferences, IP address, and other information that may help Asurion improve the customer experience, mitigate fraudulent activity, and comply with legal requirements. Such information may include, but is not limited to the following:

#### Log information

When you visit Asurion's sites we automatically collect and store certain information in our server logs. This type of information includes details of how you interacted with our services. It may include personal information such as: IP address, Unique Device Identifier, or CallerID / ANI (Automatic Number Identification) information, content of web pages, transaction with APIs (Application Program Interface), transactions with IVR (Interactive Voice Response) systems, activity and content of visitor interaction with call center representatives; application usage activity, hardware information, hardware and system settings; browser type, browser language, the date and time of your request, referral URL, etc.

#### Cookies

A cookie is a small, data file that is managed by your web browser or other application and stored on your local system. Asurion uses session and persistent cookies to, among other things, identify your computer during a particular interaction and analyze your behavior during a particular visit. Most web browsers provide you with the ability to accept or decline cookies, as well as to be warned each time a cookie is being sent. If you choose to decline cookies, you may not be able to fully use Asurion's services.

#### Pixel tags

Pixel tags, also known as web beacons, help Asurion better manage user experience and content tracking. Pixel tags are tiny graphics with a unique identifier, which provide a similar function to cookies and are used to track user interaction with content provided by Asurion or an affiliate organization. In contrast to cookies, which are stored on a user's computer hard drive, pixel tags are embedded invisibly within content. The small size and transparency of pixel tags are not intended to deceive content recipients, but minimize distraction.

#### Third-party data sources

Asurion may leverage external data sources in order to provide context and background on the users of its services in order to improve customer experience, mitigate fraud or malicious activity, or comply with internal company and external

regulatory requirements.

## Do Not Track and Third-Party Advertising Cookies

Do-Not-Track is a public-private initiative, <http://www.w3.org/2011/tracking-protection/>, that has developed a technical “flag” or signal that an end-user may be able to activate within their browser software to notify sites that they do not wish to be “tracked” by third parties as defined by the initiative. The initiative, however, has not reached a consensus as to exactly what technical or other actions those parties receiving the signal should take. As a result, Do-Not-Track has not yet been standardized and most sites, including Asurion Sites, do not alter their behavior or change their services when they receive a “do-not-track” flag or signal. You can, however, make decisions about your privacy and the advertisements you receive.

Some of the ads you receive on sites are customized based on predictions about your interests generated from your visits to different Sites. This type of ad customization is sometimes called “online behavioral” or “interest-based” advertising. We partner with a third-party to manage our advertising on other sites. Our third-party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising [click here](#) or if you are located in the European Union click [here](#). Please note you will continue to receive generic ads. As an alternative to the opt-out, you can also elect to block all cookies from first parties (such as Asurion) and from third parties (such as entities involved in advertising) by using the cookie blocking options built into your browser software. Please note, however, that if you do decide to block cookies, some parts of Asurion’s sites may not function correctly.

## How we use your personal information

Asurion may use your personal information to:

- Fulfill a service to you;
- Complete your purchase;
- Establish and verify your identity;
- Activate and maintain and your account;
- Handle and resolve billing disputes;
- Monitor and maintain the performance and functionality of the device consistent with your choices;
- Provide technical support and click-to-chat functionality;
- Protect and improve our services;
- Offer updates, notices and other information about site, product or services and services available from Asurion or its affiliates as permitted by law. (Note: at any time you may choose to withdraw your consent to Asurion’s use or disclosure of your personal information for marketing and promotional purposes by contacting Asurion as outlined in [Where to turn with questions](#) section of this policy);
- Respond to your questions, inquiries, comments and instructions;
- To enforce the applicable Terms of Service;
- Comply with the law and defend our rights;
- Track and analyze de-identified data and provide such data to third

- parties that provide services to Asurion;
- Protect against fraud and potential fraud;
- Notify you of any known breach of your personal information; and
- Maintain the security and integrity of Asurion's systems and services.

## **How we share your personal information**

We will not use or disclose your personal information to non-affiliated third parties except as disclosed in this policy.

Asurion may transfer or license your personal information to:

- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing. These companies are required to comply with the principles set out in this policy and only use such personal information for the purposes for which it was provided to them;
- A third-party, in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of its business or of any assets or shares of our business or a division thereof in order for you to continue to receive the same or similar products and services from the third-party. In such an event, we will provide notice of any material change to this policy, or our services, in the manner described in this policy. In these circumstances, personal information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

Asurion may also disclose your personal information to:

- Comply with the law and/or legal process in which a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);
- Defend our rights and/or property or the rights and property of others;
- Enforce our Terms of Use and/or this policy;
- Respond to claims that the content(s) of a communication violates the rights of another;
- Detect, prevent or otherwise address fraud, security, or technical issues.

## **How we protect your personal information**

We use commercially reasonable technical, administrative, and physical controls best practices to protect your personal information including data encryption where appropriate; however, since the Internet is not a 100% secure environment, we cannot ensure the security of personal information during its transmission between you and us. Accordingly, you acknowledge that when you transmit such personal information, you do

so at your own risk. We will notify you of any confirmed security breach of your personal information to the extent required by and in accordance with state and federal law.

### **How long we keep your personal information**

Asurion will retain your personal information as long as necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or not prohibited by applicable law.

### **How you are notified if the policy changes**

We may change this policy from time to time. If we do, we will post the updated policy with the last revised date. Your continued use of the site, product or service means that you consent to the updates. You should periodically read the policy to understand our privacy practices.

If we make material changes to this policy, then we will notify you in the site, product or service or by email and seek your affirmative consent.

### **Communicating with you electronically**

By using our services, you agree that we can communicate with you electronically. This includes any required notifications (i.e. legal, technical, regulatory, security, privacy) relating to your use of the services.

### **Your rights related to your personal information**

While we take various steps to ensure the accuracy and completeness of your personal information, we rely upon you to provide accurate and complete personal information when interacting with us.

Upon your request and as allowed or required by law and consistent with our applicable partner agreements, you may request Asurion to take the following actions with your personal information: (i) provide you with a copy, (ii) correct, (iii) update, or (iv) delete. To make such a request, or if you have a privacy-related complaint, please contact Asurion via postal mail or email as provided in the [Where to turn with questions](#) section of this policy. We will respond to your request within a reasonable timeframe.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider at <https://feedback-form.truste.com/watchdog/request>.

### **A few notes about social media**

Please be aware that any information that you submit to a social media site such as Facebook, Instagram or Twitter is done at your own risk and without any expectation of privacy. Asurion cannot control the actions of social media site users and is not responsible for any content or submissions contained on such sites. You should always review the privacy policy of any third-party site or site, product or service.

By using any functionality that permits submissions to social media sites, you are indicating that you have reviewed the applicable privacy policy and terms of use of that site. Additionally, in the event that we offer functionality through the site, product or service that permits the posting of content on social media, please be aware that these sites may allow you to publicly post, and share this content. Asurion cannot guarantee the privacy and safety of these sites and is therefore not responsible for any content you post. Use these features at your own risk.

### **Children under 13**

The site, product or service is not directed to children under 13. We do not knowingly collect personal information from children under 13. If you become aware that your child is accessing the site, product or service and providing personal information without your consent, please contact us by using the information provided below. We will take steps to remove personal information from our storage systems and terminate the account if we determine that a child under 13 has accessed the services.

### **International data transfers**

We may transfer personal information that we collect about you outside of the country in which it was collected. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from local law, please note that you may be transferring personal information about yourself to a country and jurisdiction that does not have the same data protection laws as the European Union. By doing so, you are consenting to the transfer, use, and disclosure of personal information about yourself to the U.S. as described in this policy.

### **APEC participation**

The Asurion privacy practices, described in this policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found [here](#).

To learn more about our APEC CBPR Certification click [here](#).

### **Accountability and governance**

At Asurion, we are dedicated to ensuring your confidentiality by protecting the personal information entrusted to us. That commitment is fundamental to the way we do business and is reflected in our privacy policies.

Asurion has a Chief Privacy Officer who is responsible for overall privacy governance. All of our employees are responsible to maintain your privacy and we are available to address any questions or concerns you may have.

### **Where to turn with questions**

If you have any questions about this policy, about our site, product or service, or want to request access to, correction, or deletion of your personal information, or have a privacy-related complaint, you can contact Asurion by email at [privacy@asurion.com](mailto:privacy@asurion.com).

You may also contact us at:

Asurion Canada, Inc.  
Attn: Privacy Office  
c/o Office of the General Counsel  
648 Grassmere Park  
Nashville, TN 37211