

## Noblr Privacy Policy

Thank you for your interest in Noblr and our services. When we refer to “Noblr”, “we,” “us,” or “our” in this Privacy Policy, we are referring to Noblr Reciprocal Exchange, Noblr, Inc., Noblr Risk Management, LLC and Noblr Insurance Services, LLC headquartered at 1 Union Street, Suite 210, San Francisco, CA 94111. When you use the Noblr mobile applications (the “Apps”) or the Noblr website (the “Website”) or the Noblr services (the “Services”), you trust us with your information. We are committed to keeping that trust. That starts with helping you understand our privacy practices, including what information we collect and how we use and store it. The security of your personal information is extremely important to us, and this Privacy Policy describes how Noblr collects and uses your personal information in order to provide you with our Services. Please take the time to get to know our practices. If you have any questions or comments about this Privacy Policy, please contact us as described below.

By using our Apps, our Website, or our Services, you agree to this Privacy Policy and you consent to the collection, transfer, storage, disclosure, and use of information about you in accordance with its terms. Please also review the Terms and Condition (<https://www.noblr.com/terms-and-conditions>) that govern the use of our Services.

### **The information We May Collect:**

We collect information about you when you use our Apps, Website, or Services, in order to provide you with an insurance quote, to allow you to preview and evaluate the App or the Services, and to service your insurance policy if you become a member of Noblr Reciprocal Exchange. We also gather personally identifiable information from you and from outside business partners for business purposes. This information may include, but is not limited to, your name, home address, email address, driver’s license number, mobile phone number, social security number, marital status, family member information, and your log-in information when you log into our Apps or the Website. Also, we maintain records that include, but are not limited to, insurance policy coverages, premiums, payment and claims history. The information we collect from outside business partners may include, but is not limited to, your insurance coverage, driving record, vehicle information, claims history, and credit information. In addition, we may collect information about the browser you are using including location data and user files which may include photos/videos.

Additionally, when you use the Apps or the Website, the Apps and the Website and/or our business partners gather information through your internet activity. Such information may include: your IP address, browser type and settings, operating system used, the date and time of your access and URLs you access, any links to external sites or services you open, the identity of your Internet service provider or mobile carrier, and information about the type of device you are using, including any information your mobile device may provide, such as device settings, location, motion, notification and unique device identifiers. Also, by using our Apps, you agree to keep your mobile devices’ location, motion, and notification services always switched on as our Apps need such services in order to function properly. In cases where the location, motion, and notification services on your device are not switched on, there may be adverse pricing effects to you or you may be unable to continue using our Services. The App also gathers and combines data from the mobile device for the purpose of analysis and risk evaluation as well as for premium/rate calculation.

**Security:**

We use commercially reasonable and industry standard administrative, technical, personnel, and physical security measures designed to protect the information we collect about you from loss, theft, and unauthorized use, disclosure, or modification. We collect, transfer, and store your information in an encrypted environment to make sure it cannot be transferred, accessed or altered in unauthorized ways or by unauthorized individuals to the best of our ability. Whenever we collect personally identifiable information, that information is encrypted and transmitted to us or by us in a secure way. However, there is no method of transmitting, storing, or using data that is completely secure. This means that we cannot absolutely guarantee the security of information we collect about you, but we take this responsibility very seriously.

**How We Use Your Information:**

We use the information we collect to provide, maintain, protect, optimize and improve our Services, to enhance and personalize your user experience and for regular business purposes such as authenticating and authorizing access to the Services; updating your account(s); processing or servicing requested transactions or activities; offering our other products or services or the products or services of others to you; providing customer support; investigating and responding to complaints; diagnosing and addressing technical and service issues; and developing new services. We may also use the information we collect for our own analytic purposes, for marketing purposes, and to comply with legal requirements. We will also use your information to respond to you regarding the reason you contacted us.

Unless you ask us not to in accordance with the provisions of the **Choice and Transparency** section below, by using our Apps, Website and/or Services, you agree that we may contact you via phone, email, push notification, and in-app promotions.

**Cookies and Third Party Technologies:**

Noblr includes measuring tools so that we can learn how you use our Apps and Website in order to improve them in future updates. Your data is seen by us and our third party partners. For users of our Website, we may use common tracking technologies like browser cookies, web beacons, pixel tags, "Local Shared Objects" (such as "Flash" cookies), analytical tools, device IDs, or other technologies. These tracking technologies allow us to keep track of and store your preferences, enable your sign-in to the App, the Website and the Services, present interest-based advertising, track your activities across services, including third-party services, and over time, combat fraud, and analyze performance of the Services. Although most web browsers automatically accept cookies, some browsers provide settings to decline cookies or alert you when a website attempts to send you a cookie. However, some of our Services may not function properly if you disable cookies.

We also collect certain technical information about the device you use to access our site or Services, such as timestamp, hardware type, language and time zone settings, IP address, operating system type and version, and installed fonts. Some web browsers incorporate a "do not track" feature that, when enabled, signals to websites and online services that you do not wish to be tracked. Because there is not yet an accepted standard for how to respond to such a do-not-track signal, we do not recognize or respond to these signals.

If you click on links to third party sites, you will be taken to websites we do not control. This Privacy Policy does not apply to the privacy practices of those websites. Please read the privacy policy of such third party websites carefully. We are not responsible for these third party websites.

We use our own log data and third-party analytic technologies to collect information about how you use our Services and monitor the performance and usefulness of those Services. Third-party analytics services may combine the information they collect in connection with our Services with information they have independently collected over time and across different web sites. Many of these third-party analytics companies collect and use information under their own privacy policies.

**Information Sharing and Disclosure:**

Except as we may otherwise tell you in this Privacy Policy, we do not sell to third parties any nonpublic personal information. We may disclose nonpublic personal information to third parties only as set forth in this Privacy Policy, except as may be required by law or in response to an investigation by law enforcement or other government authorities, or if we have your consent to do so.

Data may be disclosed to third parties as required by law or regulation, and to our affiliates and third-party partners, as permitted by law, as necessary to fulfill your requests or to provide you the Services.

We utilize MediaAlpha to provide certain services to us regarding the App, Website and the Services. In order to receive those services, we will provide MediaAlpha with certain information, such as your zip code, whether or not you are insuring a single car or multiple cars, if you had prior insurance coverage, and whether or not you own a home. Depending on the services we obtain from MediaAlpha, we may also pass on additional data, such as information on your vehicles, the drivers of those vehicles, and your policy.

We may use the information we collect to investigate or address issues relating to your use of our App, Website or Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, official inquiries, or other third parties as necessary to enforce our Terms and Conditions (<https://www.noblr.com/terms-and-conditions>) Data from your mobile device may be deemed discoverable by third parties and used in an accident investigation and/or litigation. We may be legally required to provide this data to such third parties and/or their legal counsel or to disclose information about you when required by law, subpoena, or other legal process, or if we have a good faith belief that such disclosure is reasonably necessary to: investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; protect and defend our interests, legal rights, and property; protect the security or integrity of our Services; investigate or defend ourselves against third-party claims or allegations; protect the rights, interests, safety, and security of users of the Services or members of the public; protect against fraud or for risk management purposes; or comply with prudent legal practice, as we may determine, and applicable law or legal process.

We may get information about you from our affiliates, partners, business customers, advertisers, and other third-parties we work with, which may be combined with information that you provide to us, along with information that is automatically collected.

We may engage third parties to provide certain services on our behalf or in relation to the Apps, the Website, or the Services, such as claims processing, roadside assistance, towing, hosting services, information storage and processing, technical support, data customer research, or satisfaction surveys. We require these providers to maintain information about you as confidential, and to only use the information to perform the services specified by us in a manner consistent with this privacy policy and in compliance with applicable laws.

In connection with a sale of all or substantially all of our business, the sale or transfer all or a material part of our assets, or otherwise in a merger or transfer of all or a substantial part of our business, we may transfer all information we have collected and stored, including personal information, to the party or parties involved in the transaction as part of that transaction.

**Information We Collect From Social Networks:**

When you interact with our Services through various social media, such as when you login through Facebook or when you follow Noblr or share Noblr content on Facebook, Twitter, Pinterest, Instagram or other sites, we may receive account information from those social networks. You may use this information to ease inviting others to the Services. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our Services.

**Information Retention and Deletion:**

You may access your personal information we have recorded about you by submitting a written request which reasonably describes the information requested. This information will be provided to you within thirty (30) business days from the date your written request is received so long as it is reasonably locatable and retrievable by us. You may also request the correction, amendment or deletion of any recorded personal information that we have in our possession. We will notify you of our decision to comply with your request or our reasons for refusal within thirty (30) business days from the date your written request is received. In the event we refuse your request, you will be provided with the opportunity to file a concise statement setting forth what you believe to be the correct, relevant or fair information and the reasons you may disagree with our determination. We store data for as long as it is necessary to provide the Services as described in this Privacy Policy and for our internal business purposes. If you would like us to delete information, you may contact us as set forth in the **How to Contact Us** section below. We will make reasonable efforts to delete your information from our records, but may need to keep a copy for administrative purposes (e.g. documenting that a transaction occurred).

**Choice and Transparency:**

You may “opt-out,” or unsubscribe, from our newsletters, special offers, or other marketing communications by following the unsubscribe instructions in any email or other communication you receive from us or contacting us as set forth in the **How to Contact Us** section below. After doing so, you will not receive future promotional emails unless you open a new account or sign up to receive newsletters or emails. Please note that even after unsubscribing we may still disclose information as permitted or required by law including, but not limited to, service related announcements, important information about your policy, state required notices, and other non-marketing communications about your account or transactions that you have made. Please note that once you request removal, it may take up to two weeks to stop receiving email from us.

**Updates:**

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through the Website or through others means, such as email. To the extent permitted under applicable law, by using our Services after such notice, you consent to our updates to this Privacy Policy. We encourage you to periodically review this Policy for the latest information on our privacy practices.

**Rights of California Residents:**

California law entitles California residents who have used our Services for personal, household, or family purposes to request information concerning whether we have disclosed certain information about you within the past year to any third parties for the third parties' direct marketing purposes. California users who wish to request further information in compliance with this law or have questions or concerns about our privacy practices and policies may contact us as specified in the "How to Contact Us" section below.

**How to Contact Us:**

If you have any questions or comments about this Privacy Policy, want to request information about third-parties using information about you for direct marketing purposes, or would like to review or update information we have about you or your preferences, please contact us by email at [marketing@noblr.com](mailto:marketing@noblr.com) or write to us at 1 Union Street, Suite 210, San Francisco, CA 94111 Attn:

PRIVACY POLICY