

TruConnect Direct Privacy Policy

TruConnect Direct is Committed to Protecting Your Privacy

At TruConnect Direct we know how important your privacy is, and we are committed to providing strong Independent Agent privacy protections. This Privacy Policy (the "Policy") describes how TruConnect Direct collects, uses, and protects your personal information, and details your options with regard to our collection and use. The Policy applies to Independent Agents and to visitors to TruConnect Direct's website or its Independent Agents websites. (collectively "websites")

The Types of Information We Collect

TruConnect Direct collects information in order to provide and market our products and services. The information we collect may include:

- **Account Information:** We collect information related to your particular account, such as your name, address, telephone number, email address and phone number.
- **Financial and Credit Information:** When applicable, we collect information about your credit card, credit history, or other banking information for account opening, billing, and collection purposes.
- **Service-Related Network and Device Information:** We collect information on your TruConnect Direct activity history, as well as information on how you use and market TruConnect Direct's network, products, and services.
- **Internet Browsing and Application Information:** We may collect information on the websites you visit and the mobile apps you use, including the amount of time spent using the app or website, and how often the app or website is used.

How We Collect Information

TruConnect Direct collects information by virtue of your use of our products, services and network. This includes collecting information in the following ways:

Information You Provide

We collect information that you supply when you purchase, use or market our services or products, or otherwise communicate with TruConnect Direct representatives. Some of the ways that you provide information to TruConnect Direct include:

- When you purchase or add TruConnect Direct's products and services
- When you contact TruConnect Direct Independent Agent representatives online, by phone, or in person
- When you create, modify, or interact with our website or your online account

Information Provided by Third Parties

Other sources also provide TruConnect Direct with information. For example, TruConnect Direct receives information from:

- Credit agencies who assist with Independent Agent credit-related decisions
- Marketing companies who provide leads, contact information, and social media information
- Companies that collect consumer demographic and interest data

How We Use the Information

TruConnect Direct uses the information it collects in a variety of ways, including:

- To provide you with devices, products, and services
- To bill you for use of the products and services and maintain billing records
- To maintain a record of your interactions with TruConnect Direct
- To help you with service, product, and network-related issues
- To manage, improve, and protect the integrity and security of our network
- To improve our services and network
- To inform you about product and service updates, offers, and promotions that may be of interest
- To comply with laws and regulations
- To prevent and investigate fraud, illegal activities, and violations of our Terms and Conditions

Advertising

TruConnect Direct Advertising

We may use certain information you have provided, such as preferences expressed by use of our websites or through use of our products and services to provide you with marketing information related to TruConnect Direct products and services that may be of interest. We may provide these ads on our websites or mobile applications. This is part of our service relationship, and you may not opt-out of receiving this type of advertising.

Third Party Advertising

We will only share your personal information with third party companies for them to use for their own marketing purposes when we have your consent.

When you visit the websites, you may see third-party advertisements. Certain advertisements are placed by companies, known as ad servers, which place ads on behalf of other third parties. These companies may place and access cookies on your device to collect information about your visit to these websites. Any information they collect from these websites does not identify you personally. The information collected may be used with other data to help advertisers reach target audiences and tailor advertisements to interests they infer from your use of our and other websites. If you chose to interact

with advertisers who place ads on these websites, the information you provide to those third parties is subject to their terms and conditions and privacy policies. Any interactions with ads on these websites may lead to further targeted advertisements on our websites or other websites where those ad servers are present.

We may permit advertisers on these websites to place ads based on certain information that we have about you, including your products and services, geographic location, and demographic information. We do not release any personally identifiable information for this purpose. We may also include social network or other third-party plug-ins or widgets on our websites that may provide information to the associated social networks or third parties about your actions with our websites or the services that you use.

How We Share Information

Except as noted in this Privacy Policy, TruConnect Direct does not sell, license, or share any individually identifiable customer information beyond the TruConnect Direct family of companies, for non TruConnect Direct-related purposes, without the consent to do so from the individual whose information will be shared.

Sharing Within the TruConnect Direct Family

TruConnect Direct shares Independent Agent information within the TruConnect family of companies in order to communicate with you about your account, to provide products and services to you, and to develop the products and services that will serve you best. TruConnect Direct also shares information among the TruConnect family in order to offer and provide you with additional products and services that may be of interest.

Sharing With Third Parties

We will never sell your name, address, or phone number to those outside of the TruConnect family to market third parties' products or services without your consent.

TruConnect Direct does use third party partners for certain business purposes, and shares information with them as necessary for them to perform work on our behalf. We may also provide information that does not identify you personally to third parties for marketing, advertising, or other purposes.

TruConnect Direct also shares information with third parties in order to protect your privacy and security and to enforce our own rights. In these situations, we only share your information as needed for those companies or entities to perform specific services. In addition, those companies are required to protect your information with the same level of protection that TruConnect Direct provides. As described, we share information beyond TruConnect Direct with certain other entities in limited circumstances:

- In order to comply with court orders and other legal and regulatory requirements

- To respond to 911 and other emergencies
- To assist with identity verification and to prevent fraud and theft
- To enforce our agreements and legal rights, or to advance or defend against legal claims
- To process transactions and bills and to collect payments
- As part of a corporate business transaction (i.e., a merger or acquisition)
- With your consent

Consent Required for Individually Identifiable Disclosures

TruConnect Direct will only disclose information that individually identifies Independent Agents to third parties with Independent Agent consent, which may be obtained in writing, online through click-through agreements or orally via phone contact. Implicit consent will be obtained only in certain situations (i.e., when you purchase a product and request that it be shipped to your home or business, you implicitly consent to disclosure of your name and address to a third-party shipping company in order to complete delivery).

Third Party Entities, Applications, and Social Networks

If you choose to interact with third party applications, entities, or social networks via the TruConnect Direct websites, please be aware that the information you provide to those third parties is subject to the terms and conditions and privacy policies of those third parties, not TruConnect Direct.

How We Protect Your Information

TruConnect Direct employs a variety of safeguards in order to keep your personal information safe from unauthorized access:

- TruConnect Direct employees are trained in various privacy protections and on the proper access to, use, and disclosure of Independent Agent information.
- TruConnect Direct only permits access to sensitive personal information to those employees who have a business need to access such information.
- TruConnect Direct requires password protection to access online account information. For multi-line accounts, the primary account holder is authorized to access all account information. Other account users may access online account information only related to their device and line. The primary account holder may provide for broader or more limited access rights for other account users.
- TruConnect Direct retains information only for as long as needed for business or tax purposes, or as applicable laws, regulations, or orders require. Upon disposal of Independent Agent information, TruConnect Direct utilizes procedures reasonably designed to erase or eliminate access to information (e.g., by shredding documents, wiping media and devices, and various other measures).
- TruConnect Direct applies encryption and other security controls to protect your information that TruConnect Direct stores or transmits.

Although TruConnect Direct strives to provide the security of your personal information, no program is 100% secure and we cannot guarantee that our precautions will prevent every unauthorized attempt to access personal information. TruConnect Direct utilizes incident response plans to handle unauthorized attempts to access personal information. If you become aware of a security issue, please contact TruConnect Direct's regulatory department at regulatory@TruConnect Direct.com.

Online Privacy Policy for Children

TruConnect Direct does not intentionally or knowingly market to, collect information from, or solicit information online from children under the age of 13 without first obtaining parental consent. TruConnect Direct encourages parents to be involved with children's online activities to ensure no information is collected from a child without parental consent. If you authorize a child to use TruConnect Direct's products and services by providing them with a device associated with your account, any information acquired as a result of such use will be treated as your information in accordance with this Policy.

Choices Regarding TruConnect Direct's Use of Your Information

TruConnect Direct would like to send you certain communications about products and services that we provide. However, you may choose to limit or opt out of receiving marketing communications at any time. In order to opt out of receiving marketing communications, please call TruConnect Direct Independent Agent services and speak with a TruConnect Direct representative who can process your opt out request.

Even if you choose not to receive marketing communications from TruConnect Direct, if you purchase TruConnect Direct products or services you will continue to receive certain account and service related communications, such as invoices, Independent Agent service notices, and transactional notices.

Consumer Role in Protecting Privacy

To ensure that your personal information remains protected, TruConnect Direct encourages Independent Agents to use passwords to prevent unauthorized access to your account. Use unique, non-obvious passwords and do not share the passwords with others.

Other Information You Should Know

California Privacy Rights, Web Site Data Collection, and Do Not Track Notices

California Privacy Rights

California Civil Code Section 1798.83 entitles California Independent Agents to request information concerning whether a business has disclosed Personal Information to any third parties for their direct marketing purposes. As stated in this Privacy Policy, we will not sell your Personal Information to other

companies and we will not share it with other companies for them to use for their own marketing purposes without your consent.

California Web Site Data Collection

We do not knowingly allow other parties to collect personally identifiable information about your online activities over time and across third-party web sites when you use our websites and services.

"Do Not Track" Notices

Because the providers of "do not track" and similar signals do not yet operate according to common, industry-accepted standards, TruConnect Direct currently does not respond to those signals. For more information on Do Not Track, please visit www.allaboutdnt.com.

California Independent Agents who wish to request further information about our compliance with these requirements, or have questions or concerns about our privacy practices and policies may contact us via e-mail at regulatory@TruConnect Direct.com.

Changes to the Policy

TruConnect Direct reserves the right to make changes to its Privacy Policy. Please check back periodically for changes. If any changes are made, TruConnect Direct will revise the effective date of the Privacy Policy.

How to Contact TruConnect Direct

If you have any questions or concerns about our Privacy Policy, you may contact TruConnect Direct Independent Agent Services via phone, send us an email and/or submit your concerns to 10440 N. Central Expressway, Suite 700, Dallas, TX 75231, Attn: TruConnect Direct Independent Agent Services.