

Privacy Policy

July 31, 2026

Introduction

This Privacy Policy (or, the “Policy”) describes how Brown & Riding (“Brown,” “we,” or “us”) collects, uses, and discloses Personal Information. It also describes your Personal Information rights and choices under the California Consumer Privacy Act (CCPA), and how California residents may exercise those rights. The term Personal Information, and other capitalized terms, are defined in this Policy. Please note, the CCPA does not apply to information subject to the Gramm-Leach Bliley Act (GLBA). Therefore, this Privacy Policy does not apply to information that we collect about California residents who apply for or obtain insurance products and services for personal, family, or household purposes.

This Policy applies to the Personal Information we collect that is covered under the CCPA, the methods we use to collect it, and why we collect it when you use our Services, which include when you, either directly or as a representative of a company:

- Visit our Website www.browncandriding.com (“Website” or “Site”).
- Submit a form or other feedback to us.
- Visit our offices in person.
- Communicate with us by phone, text, or web form on the Site.
- Receive emails, promotions, advertisements, or surveys from us.
- Connect with us through your social media account(s).
- Otherwise interact or engage with us, our products, or our Services.

This Policy also applies when we provide you with Services through our service providers, and other vendors who help us provide and market our products to you or otherwise support our business operations.

Our online Services offer links to websites and services that are not operated by Brown such as social media pages. Please note that these third-party websites may independently solicit and collect information from you, including Personal Information, and in some instances, they may provide us with information about your activities on those third-party websites. Though this Policy does describe the Personal Information we receive from those third parties, we do not always have control over the privacy practices of these websites and services, and we encourage you to review the privacy policies presented on every website you visit.

This Policy may be updated from time to time, and we encourage you to review it periodically for updates. Your continued engagement with our Services indicates your acceptance and consent to the information collection practices described in this Policy. By using our Services, you also acknowledge and accept our Terms & Conditions of Service.

Collection of Personal Information

What Personal Information Do We Collect?

Personal Information means information that identifies, relates to, describes, or is reasonably capable of being associated or linked, directly or indirectly, with an individual consumer or household. Personal Information does not include information that is de-identified, aggregated, or anonymized. The Personal Information we collect about you includes:

- **Personal identifiers and contact information**, such as your name, mailing and billing addresses, personal email address, telephone number, unique personal identifier and online identifier.
- **Business information**, including your business' name, job title, address, telephone number, and email address.
- **Device information**, meaning information about the computer device you use to interact with our online Services, such as your Internet Protocol (IP) address, device identification number, model, and manufacturer, operating system, browser type and version, Internet service provider, and mobile carrier.
- **Government Issued Identification Information**, such as Social Security number, driver's license number, military or other government ID, state issued identification number, and passport number.
- **Electronic communication information**, such as the content of messages you send us or that we exchange with you through emails, text messages, Website forms, or information that you send to us online.
- **Demographic information**, including race or ethnicity, age, date of birth, gender, marital status, family composition, military or veterans' status, household income, disability status, and nutrition/fitness lifestyle preferences.
- **Audio and video recordings**, including audio recordings of telephone calls with our customer support teams, and video footage of activities at our physical locations.
- **Payment information**, which may include your name, company affiliation, billing address, payment card information, and other invoicing information. Please note that we partner with a third-party payment processor for credit or debit card purchases. .
- **Financial Account information**, which may include bank account number, credit card number, debit card number, and other financial information.
- **Location & geolocation information**, such as the mailing address you provide to send correspondence to. Our Website may also collect general location information from your device or IP address.
- **Commercial information**, such as your purchase history with us or other details regarding the products or Services that you prefer or have considered, or Services that you provided us with feedback about.
- **Professional and educational information** such as your occupation, education level, duty postal code, paygrade, unit code, and veteran status.
- **Internet or electronic network activity**, such as browsing history, search history, user interaction information and other details about your visit to our Website, or advertisements. This information may include data such as Uniform Resource Locators (URLs) of our

Website's webpages, Services viewed or searched for, page response times, download errors, length of visits to certain pages, and information about how the Site is performing.

- **User interaction information**, such as webpages you were visiting when you came to our Website and pages you went to when you left the Site, pages browsed, items you looked at, hover over or click, information you type or enter into our online Services, interactions with advertisements, including information provided in those ads or to those advertisers, information from other platforms where we interact including social media platforms operated by other companies, and information collected through cookies and other website technologies. For more information about the website technologies our Website uses, please see the Tracking Technologies section below.
- **Information created or inferred based on other Personal Information**, such as information from the use of our Services that we use to detect fraudulent behavior, and/or to infer your preferences about our Services to serve you with personalized content that we think you may be interested in.
- **Sensitive Personal Information**, such as your racial or ethnic origin.

How Do We Collect Personal Information about You?

We collect information about you in different ways. Specifically, we collect your information: (1) when you interact directly with our Services (Direct Interactions with Us); (2) automatically through the website technologies that are present on our Website (Tracking Technologies); (3) from other companies we partner with and people who may refer you to us (Other Companies and People), and (4) through Publicly Available Sources. Each category of Personal Information collection sources is described below.

Direct Interactions with Us

You may give us information about yourself, including contact information, payment information, order information, feedback, or preferences when you:

- Provide, or your employer provides, your contact or other information to us while working with us, either directly as a business partner or as a representative of your company.
- Visit our physical locations.
- Attend meetings, events or conferences that we organize or sponsor.
- Complete forms, surveys, provide ratings, reviews, or submit other feedback to us.
- Correspond with us by phone or email.
- Provide services to us.
- Message us on social media or other platforms or otherwise engage with our online Services.
- Subscribe to our emails.

- Message us on social media or other platforms or otherwise engage with our online Services.
- Report a problem with our Website, or other Services.

Tracking Technologies

When you interact with our Website, email features, or other online Services, the cookies and other website technologies we use (collectively “tracking technologies”) collect information about your computer or other device used to access the Services such as device identifiers, as well as the internet or electronic network activity and user interaction information associated with the identifiers, as described above in the What Personal Information Do We Collect? section above.

The data collected by tracking technologies does not generally identify you by name. These technologies usually identify the device you are using, such as by your IP address, or device identifier. These device identifiers may reveal or be connected with you by name, email address, or other personal identifier when our systems correlate it with the Personal Information you provided directly to us.

We use the information that is automatically collected through tracking technologies for analytics purposes, and to maintain the security and functionality of our Website.

The kinds of tracking technologies we use include:

- Necessary and performance cookies to maintain functionality of our online Services and help us deliver our Services and products you may purchase, route traffic between servers, retain user preferences, enable you to log in and stay logged in, and help us understand how the Services are performing.
- Analytics and research technologies to understand, improve, and research features and content included in the Services, including how users use the Services, the content and products that users view most frequently.
- Location technologies (including your general location based on your IP address) to verify your location, prevent fraud, deliver or restrict content based on your location, and provide Services personalized to you with location-relevant content.
- Security technologies for purposes such as to detect activity that might violate our Terms & Conditions of Service, prevent fraud, unauthorized access or activity, or other misuse of our Services; and to protect our business.
- Communication technologies to determine whether you have opened, viewed, or otherwise interacted with the emails we send to you.
- Marketing and targeted behavioral advertising technologies to provide you with personalized advertisements, communications, and other content about the Services and, in some cases, an external party’s products and services. For example, we use third parties to improve our ability to identify visitors to our website. As part of this service, we may make available identifiers to these third parties including our visitors’ IP addresses,

cookies, and hashed versions of email addresses captured from your visit. We, and third parties, use this data to obtain more information about our visitors and reach out to them through other channels, such as email and/or direct mail.

Other Companies and People

We collect some Personal Information about you from other external sources, including our advertising and social media partners, other companies and individual consumers.

We also collect Personal Information from our partners and other companies for business referral purposes, including companies whose products or services you have used in the past.

We may use Personal Information collected from other companies and people to supplement the Personal Information we have collected from and about you to maintain your customer profile, direct relevant advertisements to you, and to provide you with personalized communications and other content we think you may be interested in.

Additionally, we may collect limited Personal Information from other customers that refer you to us, such as your email address or other contact information, in order to provide you with information about our products and Services.

Publicly Available Sources

We may collect Personal Information from consumer reviews of our Services. This includes, for example, reviews of our Services that you publish on a third-party platform.

Why Do We Collect Your Personal Information?

We collect Personal Information for one or more of the following business or commercial purposes:

- To provide, support, personalize, and develop our Website, and Services.
- To improve our insurance products and services, to carry out market research, to perform data analytics, for general risk modeling purposes, for transferring books of business, company sales and reorganizations, and for statistical analyses.
- For the prevention and detection of fraud, money laundering or other crimes.
- To provide you with support and to respond to your inquiries. To help maintain the safety, security, and integrity of our Website, products and Services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and Services.
- To respond to law enforcement requests, inquiries from regulatory authorities, and as required or permitted by applicable laws, court orders, or regulations.

- As described to you in our Notice at Collection provided in accordance with the California Consumer Privacy Act (“CCPA”) and other comprehensive US state consumer data privacy laws.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our customers is among the assets transferred.
- For other uses as may be permitted or required by applicable law.

Disclosures of Personal Information

- We may disclose the Personal Information we have collected about you to provide our Services and comply with legal obligations with certain third parties, as described below. We may disclose your Personal Information with our affiliated entities to assist in the delivery of Services to you, and for other purposes authorized under this Privacy Statement.
- We may disclose your Personal Information to third parties, including insurance companies and third-party administrators to assist us in managing our business.
- Other people, such as when you direct an authorized representative to act on your behalf when submitting a Personal Information rights request.
- Mandatory recipients or recipients who need access to Personal Information for safety, security and legal purposes, such as law enforcement agencies or recipients engaged in legal processes.
- Affiliates and subsidiaries.
- Professional services organizations, such as auditors and law firms.
- Companies that you direct us to interact with.
- Third parties to obtain more information about our website visitors and reach out to them through other channels, such as email and/or direct mail.
- Third parties to market their products or services to you if you have consented to or not opted out of such disclosures.
- Government entities as needed to provide you with our Services, comply with any court order, law, or legal process, including responding to any government or regulatory request prevent illegal or fraudulent activity.
- Internet service providers.
- With your consent.
- For any other purposes of which we provide notice when collecting your information.

- To a buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, where one of the transferred assets is the Personal Information we hold.
- To enforce or apply our Terms & Conditions of Service and other agreements.
- To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection, and credit risk reduction.

Your Privacy Choices and How to Exercise Them

We provide all customers with the following choices for management of their information. The next section, **California-Specific Privacy Rights Information**, provides information to consumers who reside in California.

Managing SMS Messages

If you receive SMS communications from us, we will not sell or share your phone number, opt-in to an SMS campaign or your consent status, nor will we disclose it to any third party for purposes other than providing the messaging. For example, we may disclose this information with the third-party providers that help us provide our text messaging services, such as platform providers and wireless carriers.

Managing Promotional Emails

You can opt-out of promotional communications sent via email by clicking the “unsubscribe” link that is included at the end of each email. Please note that even if you opt-out of promotional emails, we may still need to send you emails about your account and other transactional information. More information about how we use email to communicate with you is available in our Terms & Conditions of Service.

Notice at Collection and California Privacy Rights Information

This section of the Policy is our Notice at Collection for California residents in accordance with the California Consumer Privacy Act (“CCPA”) and with certain requirements of other comprehensive U.S. state laws regarding consumer data privacy and protection.

This chart describes our Personal Information collection practices over the last 12 months:

Category of Personal Information Collected	Disclosed to Service Providers or Contractors?	Sold to or Shared with Third Parties?	Personal Information Retention Period
<u>Identifiers & Contact Information</u> (e.g.,	Yes	No	As long as it is reasonably necessary to fulfill the purpose

<i>name and other contact details such as your email address, mailing address, phone number, social media handles/profile information, IP address, date of birth, or account name)</i>			for which it was collected and to comply with applicable laws and regulations
<u>Personal Information described in California's Customer Records statute</u> (Cal. Civ. Code § 1798.80(e)) <i>(telephone number, bank account number, credit card number, debit card number, or any other financial information as well as the categories listed in "Identifiers" category above)</i>	Yes	No	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations
<u>Commercial Information</u> (e.g., <i>records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or</i>	Yes	No.	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations

<i>tendencies with other companies)</i>			
<u>Internet, Network Activity and User Interaction Information</u> (e.g., <i>browsing history, search history, and information regarding your interaction with the Website</i>)	Yes	No	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations
<u>Geolocation Data</u> (general geolocation)	Yes	No	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations
<u>Audio, Electronic, Visual, or Similar Information</u> (e.g. <i>audio or video recordings</i>)	Yes	No	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations
<u>Professional or Employment-related Information</u> (e.g. <i>your occupation, professional affiliation, and educational history</i>)	Yes	No	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations
<u>Inferences</u> (e.g. <i>about your preferences, interests, and purchasing tendencies</i>)	Yes/No	No	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations

<u>Sensitive Personal Information</u> (e.g. racial or ethnic origin)	Yes/No	No	As long as it is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations
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We have collected the above categories of Personal Information for the following business or commercial purposes in the last 12 months:

- Performing Services, including providing customer support.
- Internal business and operational purposes that support our Services, including verifying and maintaining the quality and safety of our Services, and identifying and repairing errors that impair the functionality of our Services.
- Protecting the privacy, security, and integrity of your Personal Information.
- Undertaking internal research for technological development and demonstration.
- Other internal business purposes, including:
 - Complying with legal obligations, including prosecuting people responsible for fraudulent, malicious, deceptive or illegal activities.
 - Exercising our legal rights or defending claims filed against us.
 - Notifying consumers of Service-related issues.
 - Enforcing and notifying of our Terms and Conditions, this Privacy Policy, and other policies; and for records retention purposes.

Exercising Your California Privacy Rights and Choices

California residents may have the ability to exercise certain rights with respect to your Personal Information, including:

- The Right to Access/Know what Personal Information We Have Collected.
- The Right to Correct Inaccurate Information.
- The Right to Request that We Delete Your Information.
- The Right to Non-Discrimination for the Exercise of Privacy Rights.
- The Right to Opt-Out of Sale or Sharing of Personal Information/Opt-Out of Targeted Advertising.
- The Right to Limit the Use and Disclosure of Your Sensitive Personal Information.
- Rights Related to Automated Decision-Making.

If you would like to exercise any of your applicable rights, please do so by filling out by emailing us at legal@brcins.com. Please note that we may ask you to verify your identity before responding to your requests.

To protect you and your Personal Information and depending on the type of request you make, we may need to ask you for additional information to verify your identity before processing a request, where applicable. You may have the right to submit a request to exercise your rights through an authorized agent, in which case your agent will be required to present signed written permission to act on your behalf. You may also be required to independently verify your identity with us and confirm that you have provided authorization to the agent.

Our Website honors the user-enabled opt-out preference signal Global Privacy Control (“GPC”). When you have enabled this opt-out preference signal on browsers that support it, our Website will respond by disabling the targeted advertising cookies present on our Site for that browser. You can allow our Website to “ignore” your opt-out preference signal choices in our “Your Privacy Rights” or “Cookie Settings.”

California Online Privacy Protection Act Disclosure

We do not support “Do Not Track” (“DNT”) signals. DNT is a preference you can set to inform websites that you do not want to be tracked. You can enable it by changing the settings in the Preferences or Settings page of your web browser. Our Website does honor GPC signals.

Notice of Financial Incentive

We may from time-to-time offer certain financial incentives as defined by the CCPA that can result in free items, such gift cards for participating in surveys that may involve the collection of your Personal Information, or the Personal Information of someone else you think may be interested in our products and Services. Any financial incentive we offer will comply with the CCPA, reasonably relate to the value of the Personal Information, and contain written terms that describe the program’s material aspects. Do not provide your Personal Information if you do not want to opt into these offers. If you wish to opt out of a promotional offer, please contact us at legal@brcins.com.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Information, we consider applicable legal requirements, the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your Personal Information, and whether we can achieve those purposes through other means.

Information Security

The security of your Personal Information is important to us. We maintain reasonable security measures that are proportionate to the volume and nature of the Personal Information we maintain.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for your account with us, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

The transmission of information via the internet is not completely secure or error-free. Although we have implemented safeguards to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Website.

Children's Privacy

We do not direct the Site to children under the age of 16 and we do not knowingly collect, use, store, sell, share or otherwise disclose the Personal Information of children under the age of 16 or minors as defined by local legal requirements. If we learn we have mistakenly or unintentionally collected or received Personal Information from a child without appropriate consent, we will delete it. If you believe we mistakenly or unintentionally collected any information from or about a child, please contact us at legal@brcins.com.

Changes to this Privacy Policy

This Privacy Policy may be updated over time. We publish the "Last Updated" date at the top of the Policy to notify consumers when changes are made. We encourage you to check our Website periodically for updates.

Communicating with Us about Our Privacy Policy

If you have questions about this Privacy Policy or our privacy practices, please contact us at:

Email: legal@brcins.com

Mailing Address: 901 Main Street
Suite 3650
Dallas, TX 75202

Phone: 972-402-6669

If you need to access this Privacy Policy in an alternative format, please contact us at legal@brcins.com.