

**PRIVACY NOTICE**  
**BARTON MUTUAL INSURANCE COMPANY**

January 1, 2021

**INTRODUCTION**

Barton Mutual Insurance Company (referred to herein as “Barton Mutual,” “we,” “us,” and “our”) is committed to protecting the privacy and security of the personal information we collect, use, share, and otherwise process as part of our businesses. We also believe in transparency, and we are committed to informing you about how we treat your personal information. This Privacy Notice (the “Notice”) will provide you with a comprehensive description of our practices regarding the collection, use, maintenance, protection, and/or disclosure of your personal information. To the extent any information collected is “nonpublic personal information” as defined by the Gramm-Leach-Bliley Act (“GLBA”) and applicable regulations, this Privacy Notice will apply to our use of such information.

**PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS THE SITE OR ENGAGE IN COMMUNICATIONS WITH US CONCERNING OUR PRODUCTS OR SERVICES.**

**BY DOWNLOADING, USING, ACCESSING, VISITING, OR REGISTERING WITH THE SITE, BY SUBMITTING YOUR INFORMATION THROUGH THE SITE, OR BY ENGAGING IN ANY ONLINE OR OFFLINE COMMUNICATIONS WITH US CONCERNING OUR PRODUCTS OR SERVICES, YOU CONSENT TO THIS POLICY AND TO OUR COLLECTION AND SHARING OF YOUR INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS POLICY.**

**WHAT PROCESSING ACTIVITIES ARE COVERED?**

This Policy applies to personal information we collect when you:

- Apply for a policy or request our services;
- Make a claim;
- Visit bartonmutualgroup.com (the “Site”);
- Send or receive electronic communications from us, including emails and social media messaging;
- Request information from us online via the Site;
- Interact with our email, social media, and marketing applications

**WHAT PERSONAL INFORMATION DO WE COLLECT?**

We may collect, process, and maintain certain personal information about you and members of your household for the purposes set forth below:

<b>Category</b>	<b>Types of Data and Purpose</b>
Contact Information	When you apply for a policy, visit our Site, or request our services, we may ask for your name, address, telephone number, email address, or other contact details in order to respond to process your request or inquiry. If you choose to contact us, seek support, or ask us questions, we will collect your email address and the information you choose to include in your message so that we can receive and respond to your request if needed. We may request that you provide additional information relevant to the support requested. This information helps us direct your request and respond more quickly to your needs.
Business Information	When you seek services from us in the course of contractual or customer relationships between you, your organization, and us, we collect business contact information, including your job title and company’s name, and other personal information in order to provide you with the services you have requested. This information may also include transactional information such as policy history, coverage selections, and information requests.
Cookies and Similar Technologies	Please seek the Cookies and Similar Technologies section of this Policy below. If you choose to disable cookies and similar technologies, some areas of the Site may not work properly.
Automated Information	When you visit our Site, we automatically collect information from your browser or your mobile device, which includes the date and time of your visit, your Internet Protocol (IP) address or unique device identifier, information about your location and use of the site, domain server, your browser type, cookies and data about which pages you visit and how you use the Site in order to allow us to operate and provide the Site and our services. This information is used to understand how you interact with the Site and to provide you with advertising and a more personalized experience.
Your Communications	When you communicate with us, we may retain your communications in order to process and respond to them, as well as to improve our services. We may use your email address to communicate with you about our products and services or send you periodic emails if you decide to opt-in to any of our mailing lists. If at any time you would like to unsubscribe from receiving future emails, you may unsubscribe using the link at the bottom of each email. If you receive email communications from us, we may use certain tools to capture data related to if/when you open our message and if/when you click on any links or banners it contains.
Sensitive Personal Information	We may collect information regarding your gender, Social Security number, driver’s license or government identification number, and financial information. Any payment information for a product or service may be shared and/or stored by our payment processors. We will collect this sensitive personal information with your express consent or as otherwise permitted by applicable law.
Third Party Information	In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, reinsurers, credit reporting agencies, business partners, our affiliates, or publicly-available sources.

**HOW DO WE USE YOUR INFORMATION?**

We collect and use the types of personal information listed above in the following ways:

- Provide you with information or services that you request from us;
- Manage our relationship with you;
- Related to the reason for which the information is provided, such as underwriting, reinsurance, claims administration, and compliance;
- To carry out any obligations and enforce our rights arising from any contracts between us, including billing and collections;
- To provide customer service;

- Allow you to contact us and facilitate your communication with us;
- Respond to your feedback, requests, questions, or inquiries;
- Operate our website(s);
- Detect fraud and prevent loss;
- As necessary or appropriate to protect the rights or property of our clients or others;
- Operate our business; and
- As otherwise described to you when collecting your personal information.

**SHARING AND DISCLOSING OF YOUR PERSONAL INFORMATION**

We need to share your personal information to run our everyday business. In the section below, we identify the reasons we can share your personal information, the reasons we choose to share, and whether you can limit this sharing:

Reasons we can share your personal information	Does Barton Mutual share?	Can you limit this sharing?
<b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> – to offer our products and services to you.	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes</b> – information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

We only disclose nonpublic personal information to nonaffiliated third parties as permitted by law and for the purpose of performing services for you, functions on your behalf, or which are a necessary part of effecting or administering a transaction. We do not sell your personal information to third parties.

Federal law gives you the right to limit only (1) sharing for affiliates' everyday business purposes – information about your creditworthiness; (2) affiliates from using your information to market to you; and (3) sharing for nonaffiliates to market to you. As indicated above, we do not share your information for these purposes.

The nonaffiliated third parties we may share information with include independent claims adjusters, appraisers, attorneys, your insurance agent, independent inspectors, governmental agencies, and our reinsurers.

**COOKIES AND SIMILAR TECHNOLOGIES**

**Cookies**

A "cookie" is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a "session" cookie) or a future browsing session (a "persistent" cookie). "Session" cookies are temporarily stored on your hard drive and only last until they expire at the end of your browsing session. "Permanent" cookies remain stored on your hard drive until they expire or are deleted by you. Local stored objects (or "flash" cookies) are used to collect and store information about your preferences and navigation to, from, and on a website.

First-party cookies are set by the Site and they can only be read by the Site. Third-party cookies are set by a party other than us, including advertisers, ad networks and servers, content providers, and application providers. These third-parties may use cookies alone or including personal information about your online activities over time and across different websites and other online services. They may use this information to provide you with behavioral advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about targeted content, you should contact the responsible party directly or consult their privacy policies.

**Similar Technologies**

In addition to cookies, there are other automatic data collection technologies, such as Internet tags, web beacons (clear gifs, pixel tags, and single pixel gifs) and navigational data collection (log files, server logs, etc.) that can be used to collect data as users navigate through and interact with the Site:

- **Web beacons:** These are tiny graphics (sometimes called "clear GIFs" or "web pixels") with unique identifiers that are used to understand browsing activity. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are rendered invisible on web pages when you open a page.
- **Social Widgets:** These are buttons or icons provided by third-party social media providers that allow you to interact with social media services when you view a webpage or mobile app screen. These social widgets may collect browsing data, which may be received by the third party that provided the widget and are controlled by third parties.
- **UTM Codes:** These are strings that can appear in a URL (the "Uniform Resource Locator," which is typically the http or https address entered to go to a web page) when you move from one web page or website to another, where the string can represent information about browsing, such as which advertisement, page, or publisher sent the user to the receiving website.

The aggregate data collected by these passive technologies typically does not target any personally identifying information. However, personal information we store about you may be linked to information stored in and obtained from cookies in order to improve our marketing, analytics, or website functionality.

**What Cookies and Similar Technologies Are in Use and Why Do We Use Them?**

**Google Marketing Platform.** We use the Google Marketing Platform (Google Analytics Advertising Features and DoubleClick) to track user activity on the Site and to serve personalized advertisements. Your browser is assigned a pseudonymous ID used to track the ads that have been served to your browser and to identify those on which you've clicked. The cookies enable Google and its partners to select and display ads based on your browsing behavior. For more information on how Google uses this information, visit <https://support.google.com/displayvideo/answer/7621162>. To block certain ads served by Google, please visit <https://support.google.com/ads/answer/2662922>.

Cookie	Description	Category	Duration
1P_JAR	This cookie carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website	Marketing	30 Days
NID	This cookie is used to help customize ads on Google properties, like Google Search. This cookie will remember your most recent searches, your previous interactions with an advertiser's ads or search results, and your visits to an advertiser's website	Marketing	6 Months

DV	Used for the purpose of targeted advertising	Marketing	10 Minutes
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### **Choices About Cookies**

We provide you with choices regarding the personal information you provide to us, and we have created ways to give you control over our use of your information. Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being sent by website tracking technologies and advertising. Note that, if you decline the use of cookies, you may not have access to the full benefits of the Site.

### **HOW LONG DO WE STORE YOUR PERSONAL INFORMATION?**

We will retain your personal information as needed to fulfill the purposes for which it was collected. We will retain and use your personal information as long as necessary to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

When we, in our sole discretion, believe we no longer have a purpose to retain your personal information, we will securely destroy your personal information in accordance with applicable law and our policies. We take reasonable steps to delete the personal information we collect if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. To the extent permitted by law, we may retain and use anonymous and aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement.

### **HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We have put reasonable and appropriate security measures in place to protect the personal information that you share with us from being accidentally lost, used, altered, disclosed, or accessed in an unauthorized manner. From time to time, we review our security procedures to consider appropriate new technologies and methods. We also restrict access to nonpublic personal information to employees, agents, and third-parties on a need-to-know basis and require any individual to whom we permit access to your personal information to protect it and keep it confidential.

We use a secure server. While our security measures seek to protect your personal information in our possession, no security system is perfect, and no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee or warrant the security of any information you transmit to or from our Site, through social media, or by email communications, and you do so at your own risk. We cannot promise that your personal information will remain absolutely secure in all circumstances.

The safety and security of your personal information also depends on you. Where you use a password for access to restricted parts of our Site, you are responsible for keeping the password confidential. Do not share your password with anyone. If a security breach causes an unauthorized intrusion into our Websites or systems that compromises your data, we will notify you and any applicable regulator when we are required to do so by applicable law.

### **RIGHTS AND CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

Please use the Contact Us details at the end of this Notice to exercise your rights and choices under this Notice.

- **Email Opt-Out:** If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link available at the bottom of our communications or by contacting us at [privacy@bartonmutualgroup.com](mailto:privacy@bartonmutualgroup.com) and providing your full name, mailing address, phone number, and email address so that we may identify you in the opt-out process.
- **Updating Your Personal Information.** If any of the personal information you have provided to us changes, please let us know. For instance, if your email address changes, you may wish to cancel any request you have made of us; or, if you become aware of inaccurate personal information about you, you may use the “Contact Us” details provided at the end of this Policy to update your information. You may also edit your account details if you have a user account through our Site. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete personal data that you provide to us.
- **Cookies.** As discussed above, you can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly.

### **ONLINE TRACKING**

We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions. “Do Not Track” is a web browser setting that seeks to disable the tracking of individual users’ browsing activities. We adhere to the standards set out in this Policy and do not currently respond to “Do Not Track” signals on the Site or on third-party websites or online services where we may collect information.

### **YOUR CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit the CCPA Privacy Notice for California residents here:

[https://bartonmutualgroup.com/images/uploads/CCPA\\_Privacy\\_Policy\\_01-01-2021.pdf](https://bartonmutualgroup.com/images/uploads/CCPA_Privacy_Policy_01-01-2021.pdf)

### **CHILDREN’S ONLINE PRIVACY PROTECTION ACT COMPLIANCE**

The Children’s Online Privacy Protection Act (“COPPA”), as well as other data privacy regulations, restrict the collection, use, or disclosure of personal information from and about children on the Internet. Our Site and services are not directed to children aged 13 or younger, nor is information knowingly collected from children under the age of 13. No one under the age of 13 may access, browse, or use the Site or provide any information to or on the Site. If you are under 13 years of age, please do not use or provide any information on the Site (including, for example, your name, telephone number, email address, and username). If we learn that we have collected or received personal information from a child under the age of 13 without a parent’s or legal guardian’s consent, we will take steps to stop collecting that information and delete it. If you believe we might have any information from or about a child under the age of 13 without his/her parent’s consent, please contact us using the contact information provided below.

For more information about COPPA, please visit the Federal Trade Commission’s website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

### **THIRD-PARTY SITES**

This Notice is applicable only to Barton Mutual and the specific processing activities defined in this Notice. It does not apply to any third-party websites.

The Site may contain links to, and media and other content from, third-party websites. These links are to external websites and third parties with which we have no relationship. Because of the dynamic media capabilities of the Site, it may not be clear to you which links are to the Site and which are to

external, third-party websites. If you click on an embedded third-party link, you will be redirected away from the Site to the external third-party website. You can check the URL to confirm that you have left the Site.

We cannot and do not (i) guarantee the adequacy of the privacy and security practices employed by or the content and media provided by any third parties or their websites; (ii) control third parties' independent collection or use of your personal information; or (iii) endorse any third-party information, products, services, or websites that may be reached through embedded links on the Site, social media, or email communications.

Any personal information provided by you or automatically collected from you by a third-party will be governed by that third-party's privacy policy and terms of use. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

#### **UPDATES AND CHANGES TO THIS POLICY**

We reserve the right, at any time and without notice, to add to, change, update, or modify this Policy to reflect any changes to the way in which we treat your personal information or in response to changes in law. Should this Notice change, we will post all changes we make to this Notice on this page. If we make material changes to how we treat your personal information, we will also notify you through a notice on the home page of the Site for a reasonable period of time. Any such changes, updates, or modifications shall be effective immediately upon posting on the Site. The date on which this policy was last modified is identified at the beginning of this Policy.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Site, engaging with us on social media, or communicating with us, from time to time, so that you are aware of any changes. Your continued use of the Site, engaging with us on social media, or communicating with us in any format after the "Last Updated" date will constitute your acceptance of and agreement to such changes and to our collection and sharing of your personal information according to the terms of the then-current Policy.

#### **CONTACT US**

For more information, or if you have any questions regarding this Privacy Policy or wish to exercise your rights, you may contact us using the information below, and we will do our best to assist you. Please note, if your communication is sensitive, you may wish to contact us by postal mail or telephone.

<b>In Writing:</b>	Barton Mutual Insurance Company P.O. Box 99 Liberal, MO 64762
<b>By Telephone:</b>	1-800-455-1646
<b>By Email:</b>	privacy@bartonmutualgroup.com