

Privacy Policy

Effective December 11, 2018

Please carefully read this *Privacy Policy* and our *Terms of Use* before using our Website.

Thank you for visiting the Easy Life website of Highland Capital Brokerage, Inc. (future references to “*Company*” or “*we*” or “*our*” or “*us*” include Highland Capital Brokerage, Inc. and its subsidiaries, divisions, and affiliates), which provides online insurance coverage quotes and estimates, and related services.

This Website Privacy Policy (“*Privacy Policy*”) applies to the Company website located at <https://www.easylifeinsquotes.com>, and all associated sites controlled by Company and linked to <https://www.easylifeinsquotes.com> by the Company (collectively, “*Website*”) and includes information that we collect on this Website, in email, text and other electronic messages between you and this Website, through any applications that may be downloaded from this Website, and through other sources which you may use to convey information to the Company through the Website. This policy does not apply to information collected by the Company offline or through any other means, including on any other website operated by the Company or any third party.

Your privacy is important to us and we are committed to protecting it through our compliance with this Privacy Policy. To better protect your privacy, we provide this notice, which explains:

- The information we collect through our Website and why we collect it.
- How we may use or disclose your information.
- The choices you can make about the way your information is collected, used, maintained, protected and disclosed.

Please read this Privacy Policy and our Terms of Use carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using our Website, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see *Changes to this Privacy Policy*). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. Furthermore, please see our *Terms of Use* for additional information applicable to the use of our Website.

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The Information We Collect About You and How We Collect It

We help consumers shop for life insurance and other related insurance products by connecting consumers with insurance agencies, insurance agents and producers, and other third parties. An essential part of this process involves sharing relevant personal information about you with prospective insurance providers.

Personally Identifiable Information

The Website allows you to share personal information with us. The Website is designed to use personal information so that we can give you a personalized response to an inquiry regarding insurance coverage quotes, or provide you with information about insurance-related services and products that may meet your needs. We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, e-mail address, telephone numbers, or any other information the Website collects that is defined as personal or personally identifiable information under any applicable law.
- That is about you but individually does not identify you, such as your income, mortgage balance, number of dependents, height, weight, gender and age.

When you use the Website to obtain a life insurance quote, you have the option of clicking "I Know How Much Insurance I Need" or "Help Me Determine Who Much Insurance I Need." By clicking either option, you can choose to supply additional information about yourself to us, including your first name, last name, telephone number, email address and zip code. In order to receive life insurance quotes from a licensed specialist, you will be required to provide us with additional personal information which may include, but is not limited to:

- your state of residence,
- your gender,
- your age,
- your height and weight,
- your nicotine or tobacco product usage,
- your income,
- your mortgage balance,
- your general health status,
- your family information such as number of children, and
- your desired insurance coverage.

We use each of these data points to prepare and provide you with a range of life insurance quotes, contact or respond to you, complete the insurance application process and make an offer for insurance coverage. If we collect this personally identifiable information from you, you are giving us permission to use that information for the specific purpose for which it is provided and to contact you regarding site services, improve or enhance site performance, to offer you information regarding products and services, improve our Website, to communicate to you about other matters that may be of interest to you and for any other purpose described in this Privacy Policy. Users unwilling to provide personally identifiable information online are free to contact us at Compliance@highland.com.

Non-Personally Identifiable Information

In addition, we may collect, store, and use certain non-personally identifiable information when you visit our Website. This may include, information about your computer hardware and software, such as the type of browser you are using (e.g., Safari, Internet Explorer, Firefox), the type of operating system you are using, (e.g., Windows Vista or Mac OS X), the domain name of your internet service provider (e.g., America Online, EarthLink), access times and referring website addresses, and other information collected through cookies or other tracking technologies (see Usage Details). In addition, we collect information about which pages you visit within our Website. This site visitation data is identified only by a unique ID number, and it is never linked with personal information unless a user consents, as described in this Privacy Policy.

How We May Use or Disclose Your Information**Overview of Potential Uses of Your Information**

By clicking "Let's finish your application" on our Website, you expressly authorize us to share the personal information that you provided on our Website with trusted insurance agencies, insurance agents and producers, and other third parties for the purpose of providing you with a range of life insurance quotes and for the other purposes stated in this Privacy Policy. In addition, we will contact you by telephone to conduct a short interview to obtain additional personal information needed to complete and submit an application for life insurance coverage. If you do not want us to share your personal information with anyone, including with third party insurance agencies, insurance agents and producers, and other third parties, please do not submit any information on our Website. We may use your personal information for the following purposes:

- To help you identify your insurance needs.
- To help underwrite and provide accurate insurance premium rate quotes.
- To provide you with access to the products or services you have requested.
- To communicate with you regarding the insurance products that you requested through the Website as well as other products and services that may be of interest to you.
- To provide you quotes from insurance agencies, insurance agents and producers, and other third parties who may contact you using the information you provided through the Website or to obtain additional information needed to provide quotes.
- To help us create, publish and otherwise tailor the content of our Website to ensure it is relevant to your needs.
- To deliver services, such as newsletters, events, training or software that you request or purchase.
- To alert you to updated information and other new services from the Company, if you so request.
- To provide you with access to limited-entry areas of our Website, as appropriate.

We may also merge site-visitation data with anonymous demographic information for research purposes, and we may use this information in the aggregate to provide more relevant content. In some limited-entry sections of our Website, with your approval, we will combine site-visitation data with your personal information in order to provide you with personalized content. If you decline permission, we will not provide you the personalized service and we will not merge your personal information with site-visitation data.

We may send out periodic e-mails informing you of technical service or security issues related to a product or service you requested, or confirming you requested a product or service. You will not be able to choose to unsubscribe to these mailings, as they are considered an essential part of the service you have chosen.

Overview of Potential Disclosures of Your Information

Information about our customers is an important part of our business and, other than as described herein, we are not in the business of selling or otherwise providing personally identifiable information to unaffiliated third parties for their commercial use. When you submit personal information through our Website for the purpose of obtaining life insurance quotes and coverage, we will share that information with third parties only as described herein. Specifically, in addition to the usages described above, we share personal information for the following purposes:

- **To Receive Life Insurance Quotes:** We share your personal information with insurance agencies, insurance agents or producers, and other third parties to obtain insurance premium rate quotes. By clicking "Let's finish this application," you expressly authorize us and these insurance agencies, insurance agents or producers, and other third parties to contact you at the telephone number, address or e-mail address provided by you with insurance quotes or to obtain additional information for such purpose, via live, prerecorded or autodialed calls, text messages or e-mail.
- **To Obtain Life Insurance Coverage:** Insurance companies will use your personal information to determine your final insurance eligibility and rates. Once we have completed and you have approved and signed your insurance application, we will submit the application to determine if a life insurance coverage policy that meets your desired coverage amount and term length can be offered. Insurance underwriting criteria may vary for each insurance company, and each company may request or prioritize different personal information.
- **In Compliance with Law or Court Order:** We reserve the right to share your personal information with third parties if required to do so by law or if we believe such action is necessary in order to: (a) conform with the requirements of the law or to comply with legal process served upon us; (b) protect or defend our legal rights or property, the Website, or our users; and (c) investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.
- **Agents:** We employ or may employ other companies and individuals to perform functions on our behalf. Examples of such functions include removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), and providing customer service. These companies and individuals have access to personal information needed to perform their functions, but may not use it for other purposes.
- **Offers:** We may send offers to selected groups of customers on behalf of other businesses. If we do this, we will not give that business your name and address.
- **Business Transfers:** As we continue to develop our business, we might sell or buy subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the customer consents otherwise). Also, in the event that we are acquired or assigned, customer information will of course be one of the transferred assets.

- Protection of our Website and Others: We reserve the right to release account and other personal information when we believe release is appropriate to comply with the law, enforce or apply our Terms and Conditions of Website Use and other agreements, or protect the rights, property, or safety of the Company, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. However, other than as described herein, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.
- With Your Consent: Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information ("opt-out").

Other Information about the Use and Disclosure of Your Information

We sometimes use the non-personally identifiable information that we collect to monitor user traffic patterns, analyze and quantify user preferences, improve the design and content of our Website, and enable us to personalize your user experience. All such usage data shall be the exclusive property of this Website.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed or accessed by a third party in a manner that is inconsistent with this Privacy Policy.

We may on occasion combine information we receive online with outside records to enhance our ability to market to you those products and services that may be of interest to you. If you have signed up to receive our emails and prefer not to receive marketing information from this Website, please follow the "unsubscribe" instructions provided on any marketing email you receive from this Website.

Finally, this Website will not use or transfer personally identifiable information provided to us in ways unrelated to the ones described above without also providing you with an opportunity to opt out of these unrelated uses.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to Compliance@highland.com.

Changes to or Removal of Your Personal Information

If at any time you wish to change, correct, or update the personally identifiable information submitted to the Company, or otherwise have it removed from our database, you may do so at any time by submitting a request by email to Compliance@highland.com. Other than as described herein, we do not sell or disclose your personal information to third parties for their direct marketing purposes.

Usage Details

Cookies

To enhance your experience with our Website, many of our web pages use "cookies." Cookies are text

files we place in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at our Website. However, once you choose to furnish our Website with personally identifiable information, this information may be linked to the data stored in the cookie.

We use cookies to understand site usage and to improve the content and offerings on our Website. For example, we may use cookies to personalize your experience at our web pages (e.g., to recognize you by name when you return to our Website), save your password in password-protected areas, and enable you to use shopping carts on our Website. We also may use cookies to offer you products, programs, or services.

Flash Cookies

Certain features of our Website may use local stored objects (or "flash cookies") to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

Web Beacons

"Web beacons" or clear .gifs are small pieces of code placed on a web page to monitor the behavior and collect data about the visitors viewing a web page. For example, web beacons or similar technology can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. We may use web beacons or similar technology on this Website from time to time for this and other purposes.

Collection of Information by Third-Party Sites, Ad Servers, and Sponsors

Our Website may contain links to other websites whose information practices may be different than ours. While visiting this Website, you may link to another website via a window opened within (or on top of) our Website. Our privacy policies and procedures may or may not be consistent with the policies and procedures of other websites you visit while here. Users should consult, read, and understand any other website's privacy notices before choosing to provide personally identifiable data on such linked website. Our Privacy Policy and treatment of your data does not apply on third party websites and we have no control over information that is submitted to, or collected by, these third parties.

Our Website sometimes may offer products, services or content (e.g., promotions) that are sponsored by or cobranded with identified third parties. By virtue of these relationships, the third parties typically have access to the personally identifiable information that you submit, if any, in connection with that offering in order to participate in such particular Website activity. We have no control over these third parties' use of this information.

Our Website may use a third party to present or serve the advertisements that you may see on our Web pages. These third party ad servers may use cookies, web beacons, clear .gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy.

Our Website may include links to the sites of other companies, including providers of insurance products and related services. These third parties may collect, use, and store personal information about you. We are not responsible for the privacy practices of such unaffiliated third parties and this Privacy Policy does not apply to their use of your information. We encourage you to learn about the privacy policies of those companies.

Our Commitment to Information Security

We have put in place what we believe to be reasonable physical, electronic, and managerial procedures to safeguard your personally identifiable information that we collect and to help prevent its unauthorized access and use. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. To assist in keeping your personal information safe, you must use an SSL-enabled browser (i.e., Internet Explorer).

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Additionally, change your passwords often using a combination of letters and numbers, and make sure you use a secure web browser.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best 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 circumvention of any privacy settings or security measures contained on the Website.

Children under the Age of 13

Our Website is not directed towards children and we do not knowingly collect information from children. If you believe we have any information from or about a child under the age of 13, please contact us at Compliance@highland.com.

HIPAA Compliance

As a provider of services and products related to the healthcare industry, we have implemented programs to address the privacy and security implications of the rules promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

Usage Terms

Access to and use of this Website is subject to compliance with our Terms of Use.

Changes to this Privacy Policy

We reserve the right to make changes to our Privacy Policy from time to time for any reason. Such changes, modifications, additions or deletions shall be effective immediately upon posting, unless otherwise indicated. We have no duty or obligation to inform prior visitors that changes have been made, regardless of the scope and importance of the changes. If we make material changes to our Privacy Policy, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified on the Website page which contains the Privacy Policy. You are responsible for periodically visiting our Website and this privacy policy to check for any changes, and notifying the Company with any issues.

We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. Your continued use of the Website after such changes are posted will be deemed to constitute your agreement to and acceptance of such changes.

HOW TO CONTACT US

If you have any additional questions or concerns about this Privacy Policy or its implementation, you may contact us directly by email at **Compliance@highland.com**.