

Privacy Policy for the California Consumer Privacy Act

Effective Date: January 1, 2020
Date Last Updated: June 15, 2021

This Privacy Policy for the California Consumer Privacy Act (this “**Policy**”) provides for how Tokio Marine & Nichido Fire Insurance Co., Ltd. (“**we,**” “**our,**” or “**us**”) processes the personal information of California residents, in accordance with the California Consumer Privacy Act of 2018 (“**CCPA**”). Please note that this Policy does not apply to you if you are not a California resident.

1. Our Collection and Use of Your Personal Information

The table below describes the categories of personal information that we may collect and have collected during the last 12-month period.

Category of Personal Information Collected	Example
Identifiers	Real name, alias, and postal code
Data subject to the California customer records law (any category of personal information described in subdivision (e) of Cal. Civ. Code Sec. 1798.80)	Name, signature, social security number, address, phone number, passport number, driver’s license or state identification card number, insurance policy number, bank account number, medical information, and health insurance information. Some personal information contained in this category may overlap with personal information contained in other categories.
Characteristics of protected classifications under California or federal law	Age (40 years or older), marital status, medical condition, and sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions)
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Internet or network activity information	Browsing history, search history, and information regarding your use of internet and electronic networks, such as communications on our websites and other online services
Geolocation data	Physical location or movements
Professional or employment-related information	Current or past job history or performance evaluations

We use the above categories of personal information for the following business or commercial purposes:

- To respond to your request for which you have provided us with your personal information (e.g., if you provide us with your personal information when you make an insurance claim, we will use such personal information to deal with this claim)
- To provide you with information, products, and services requested by you
- To send you notices related to our products, services, and news by e-mail, register you for events, and send you other notices
- To improve our websites and provide you with content
- To test, research, analyze, and develop new products and services
- To comply with legal requirements and procedures such as a subpoena or order of a court and a search warrant
- To deal with emergencies such as a threat of death or critical injuries
- To protect our rights and properties and your and our employee’s safety
- To prevent potential and actual misconduct related to our products or services
- To establish and defend our petitions and legal and administrative claims
- To evaluate and implement a merger, sale of our subsidiary, reconstruction, reorganization, dissolution, and/or sale or transfer of all or part of our assets, as a going concern or as a part of bankruptcy or liquidation procedures or other similar procedures (please note that personal information owned by us is included in the sold/transferred assets)

We collect the above categories of personal information from the following sources:

- Our affiliates
- Directly from you
- Claim agents
- Private investigation agencies
- Attorneys
- Courts
- Medical institutions
- Assistance companies

2. Our Sharing of Your Personal Information

(1) Sale of Your Personal Information

We do not sell personal information and have not sold personal information during the last 12-month period, including the personal information of minors.

(2) Disclosure of Personal Information for a Business Purpose

The table below describes: (i) the categories of personal information that we may have disclosed for operational business purposes during the last 12-month period; and (ii) the categories of third parties to whom we have disclosed such personal information for operational business purposes during the last 12-month period.

Category of Personal Information Disclosed	Example	Third Parties to whom Personal Information Was Disclosed in the Last 12 Months
Identifiers	Real name, alias, and postal code	Government agencies, our affiliates, claim agents,

		private investigation agencies, attorneys, courts, medical institutions, assistance companies, system vendors, and consultants
Data subject to the California customer records law (any category of personal information described in subdivision (e) of Cal. Civ. Code Sec. 1798.80)	Name, signature, social security number, address, phone number, passport number, driver's license or state identification card number, insurance policy number, bank account number, medical information, and health insurance information. Some personal information contained in this category may overlap with personal information contained in other categories.	Government agencies, our affiliates, claim agents, private investigation agencies, attorneys, courts, medical institutions, assistance companies, system vendors, and consultants
Characteristics of protected classifications under California or federal law	Age (40 years or older), marital status, medical condition, and sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions)	Government agencies, our affiliates, claim agents, private investigation agencies, attorneys, courts, medical institutions, assistance companies, system vendors, consultants, and internet service providers
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Government agencies, our affiliates, claim agents, private investigation agencies, attorneys, courts, medical institutions, assistance companies, system vendors, and consultants
Internet or network activity information	Browsing history, search history, and information regarding your use of internet and electronic networks, such as communications on our websites and other online services	Government agencies, our affiliates, claim agents, private investigation agencies, attorneys, courts, medical institutions, assistance companies, system vendors, consultants, and internet service providers
Geolocation data	Physical location or movements	Government agencies, our affiliates, claim agents,

		private investigation agencies, attorneys, courts, medical institutions, assistance companies, system vendors, consultants, and internet service providers
Professional or employment-related information	Current or past job history or performance evaluations	Government agencies, our affiliates, claim agents, private investigation agencies, attorneys, courts, medical institutions, assistance companies, system vendors, and consultants

3. Your Rights and Requests under the CCPA

As a California resident, you have certain choices regarding your personal information, in accordance with the CCPA, as described below:

- (1) **Access:** You have the right to request, up to twice in a 12-month period, that we disclose the following information to you that we have collected, used, and disclosed about you during the 12 months preceding your request:
 - (I) The specific pieces of personal information we have collected about you;
 - (II) The categories of personal information we collected about you;
 - (III) The categories of sources from which we collected such personal information;
 - (IV) The business or commercial purpose(s) for collecting such personal information about you;
 - (V) The categories of third parties with whom we shared such personal information;
 - (VI) The categories of personal information which we disclosed for business purposes; and
 - (VII) For each category of personal information identified, the categories of third parties to whom the information was disclosed.
- (2) **Deletion:** You have the right to request that we delete certain personal information we collected from you.

To make an access or deletion request (described above), please contact us by sending your request by mail to the following address:

1-2-1, Marunouchi, Chiyoda-ku, Tokyo, Japan, 100-8050
Tokio Marine & Nichido Fire Insurance Co., Ltd.
Business Quality Innovation Dept.

Upon receiving an access or deletion request from you, we will respond to such request in accordance with the CCPA after verifying your identity by requiring you to submit your name,

telephone number, and other necessary information, and matching the information you provide with what we already have on file.

If you use an authorized agent under the relevant California law to make an access or deletion request on your behalf, we may require you to provide the authorized agent signed permission in order to confirm the existence of the authorization.

You will not be subject to any discriminatory treatment by us if you choose to exercise any of your rights under the CCPA.

3. Changes to this Policy

We may change this Policy from time to time. The “Date Last Updated” at the top of this page states when this Policy was last updated; any changes will become effective upon us posting the revised Policy to our website.

4. Contact Us

If you have any questions or concerns regarding this Policy or our privacy practices, please contact us at our office address described in “**3. Your Rights and Requests under the CCPA**” in this Policy.

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