

The Hadden Agency LLC dba Hadden Insurance Solutions

Privacy and Security Notice

Effective July 1, 2025

I. Applicability

This Privacy and Security Notice (the "Notice") applies to all information gathered or maintained by The Hadden Agency, LLC at our websites, as well as information transmitted to us by telephone, fax, or otherwise. Our sites contains links to other sites. We are not responsible for the privacy practices, the security measures, or the content of any such web site.

II. Your Privacy

We recognize that you have a need to control the use and management of your personal information. Our goal is to allow you to quickly and easily navigate and use our websites, web applications, and/or other means of communication to learn about our services without jeopardizing your privacy and security in any way. Many of our services are available to you without your disclosing any personally identifiable information. You can learn more about our company, the services we offer and how we can help you grow and develop your business.

III. How We Collect Information

In order to provide the tools and services you request, and for the operation and/or promotion of our business, we may need to collect information from you, including personal information. We collect information from you in the following ways:

A. Information You Provide to Us

We may collect information from you directly, such as when you enter it on a web page or web form, when you provide information to us in person or via phone, or when you include it in an email or other correspondence that you send to us. For example, we may collect information from you directly through our technical support processes, where we may ask you to provide contact information and a description of the issue you are contacting us about.

B. Information Collected Automatically Through our Websites

We may also automatically or passively collect information about your use of our websites, applications and/or services. While information collected in this manner is not typically personal information, we may combine it in ways that make it personally identifiable. When we do so, we will treat the combined information as personal

information. Technologies used in our services to passively collect such information may include:

- Cookies. Small data files placed on a device's hard drive.
- Web Beacons. Small graphic images or other web programming code called web beacons, (also known as "1x1 GIFs" or "clear GIFs") may be included on our websites or in our email messages.
- Embedded Scripts. Programming code that is temporarily downloaded onto a device, and is active only while you are connected to our websites, and is deactivated or deleted thereafter.

In addition, our services may use a variety of other hardware or software specific technologies that automatically collect information.

C. Information We Receive From Other Sources

We may also supplement the information that we collect with C. information that we obtain from other sources. We may combine the information we receive from these outside sources with the information we directly collect. In addition, we may collect information from D. our trusted external service providers for certain technical data analysis, processing and/or storage offerings.

D. Other Information We Gather from Your Purchase History and Interactions with Us

When you interact with us via phone, text, mail, email, via D. social media or in person, we may collect transactional or other information about these activities and store it with your personal profile. We may use this information to make predictions about your preferences, interests, and future purchase activity.

IV. Types of Information We Collect

A. Personal Identifiers.

Information that identifies you or another person, including name, gender, signature, address, date of birth, Social Security number, telephone and/or fax number and/or driver's license or state identification number. Personal identifiers may also include information concerning your license and/or appointment or contracting with various insurance carriers.

B. Commercial Information.

Information including records of your personal property, products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.

C. Geolocation Data.

Information that can be used to identify an electronic device's physical location.

D. Internet or Other Network Activity.

Information including browsing history, search history, and other information regarding your interaction with an internet websites, application or advertisement.

V. How We Use Your Information

We will use the information you provide to us for the purposes for which you provided the information, as stated at the time of collection, and as otherwise described in this Notice or permitted by law. The following are some of the ways in which we may use your information:

- To provide you with the tools and services that best meet your unique needs and preferences;
- To qualify you as a licensed insurance agent;
- To facilitate your contracting and/or appointment with insurance providers;
- To maintain accurate records about who you are and where you learned about us;
- To maintain accurate records and a personal profile for your secure access via the Web.
- Deliver important materials to you pertaining to insurance providers with whom you do business and products you may offer to your clients.
- To communicate with the insurance provider(s) with whom you do business and/or to process information for delivery to them;
- To contact you in response to your inquiries, comments and suggestions
- For our own direct marketing purposes, including distribution of newsletters and/or marketing materials via email.
- To improve the products and services we offer to you and develop new products and services;
- To improve our websites or mobile applications;
- Otherwise with your consent or as required by law.

A. Opting Out of Marketing Emails or Newsletters:

If you do not wish to receive marketing email from us, or if you decide you no longer wish to receive our newsletter, you can remove yourself from our distribution lists at any time by:

1. Simply replying and inserting the word "remove" in the subject field to any marketing email you receive.
2. Sending an email request for removal to privacy@haddenagency.com.
3. Writing to us at The Hadden Agency, LLC, Attn: Privacy Officer, 9 Park St, Vernon CT 06066 USA.

B. Updating your Advisor Profile and Password:

If you are an advisor/agent affiliated with us, you may update and edit your personal profile at any time by logging in at our homepage. Your edited changes will take effect immediately upon submission. You can also use this feature to change your password, should you so desire. If you want us to remove all of your personal information from our active database, email us at privacy@haddenagency.com or write to the address listed above and include your user ID and phone number along with the request to no longer have an active Personal Profile. You may also remove the information yourself by accessing your Personal Profile and entering blank spaces in the data fields.

VI. How We Share Your Information with Third Parties

Consistent with this Notice and applicable law, we may share the information you share with us with affiliated and non-affiliated third parties as follows:

- The insurance companies with whom you seek to be contracted or appointed, and/or their plan administrators;
- Our corporate affiliates;
- Third Party Service Providers - Third parties that provide us with services, including but not limited to data hosting and/or other services that allow us to provide you with the products and services you request;
- Third Party Joint Marketing Partners - Third parties with whom we have joint marketing or similar contractual agreements to provide you with marketing and promotional offers;
- Government, legal or regulatory authorities, or others, but only when required to do so by law or in response to a subpoena, court order, or other valid legal process.

Opting Out of Affiliate and/or Third Party Marketing

If you would like us to stop providing your information to Joint Marketing Partners or to our corporate affiliates for marketing purposes, please contact privacy@haddenagency.com.

VII. Privacy Rights for California Residents

Consistent with California's "Shine the Light" law (Cal. Civ. Code 1798.83), we provide California residents with the ability to "opt out" of having their personal information shared with affiliates and non-affiliated third parties for their direct marketing purposes. If you are a California resident, you may opt-out of having your personal information shared with affiliated and non-affiliated third parties for their direct marketing purposes by following the opt-out instructions in Section X below.

Effective January 1, 2020, the California Consumer Privacy Act (the "CCPA") provides California residents with new privacy protections and rights regarding their personal information. This Privacy and Security Notice has been revised to include a description of those rights and other information required to be disclosed under the CCPA. This section is applicable only to residents of California, as that term is defined by the CCPA and other California privacy laws (together "California Laws").

If you have any questions regarding this Privacy Notice, our practices, and/or your rights under California Laws, please contact us at privacy@haddenagency.com or (860) 870-5593, extension 103.

A. Information we collect.

Information You Provide Directly to Us (described in Paragraph III-A)	
Categories of Information	Personal identifiers; legally protected characteristics ¹ ; commercial information; biometric information ² ; professional or employment information.
Purposes for Collection	To provide the services you request; to recommend services that best meet your unique needs and preferences; to verify that contracting and appointment requests are received and accurately processed by the appropriate policy producers and/or plan administrators; to maintain accurate records and a personal profile for your secure access to our websites and tools; to deliver important materials to you pertaining to insurance providers with whom you do business and products you may offer to your clients; to operate incentives or contests; to contact you and/or your designated contacts directly, should the need arise.

Types of Third Parties with Whom We Share	Third Party Service Providers; Third Party Joint Marketing Partners; governmental bodies (i.e. in response to a subpoena or regulatory request)
¹ Characteristics of protective classifications under California or federal law (for example, race, national origin, religion or creed, physical or mental disability, etc.)	
² Under the CCPA, "Biometric Information" means an individual's physiological, biological or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	
Information Automatically Collected Through our Websites (described in Paragraph III-B)	
Categories of Information	Personal identifiers; internet or other similar network activity; geolocation data; inferences drawn from personal information.
Purposes for Collection	To provide the services you request; to improve our products, services, websites or mobile applications; to track your use of our websites; to create and update customer profiles; for internal market research and analytics.
Types of Third Parties with Whom We Share	Third party Service Providers; Third Party Joint Marketing Partners; digital advertising providers.
Information We Receive From Other Sources (described in Paragraph III-C)	
Categories of Information	Personal identifiers; legally protected characteristics; commercial information; geolocation data; professional or employment information.

Purposes for Collection	To improve our products, services, websites or mobile applications; to provide services; to track your use of our websites; to create and update customer profiles; for internal market research and analytics; to maintain accurate records of your licenses and appointments; to deliver important materials to you pertaining to the insurance providers with whom you do business; to contact you and/or your designated contacts directly, should the need arise.
Types of Third Parties with Whom We Share	Third Party Service Providers; Third Party Joint Marketing Partners; governmental bodies (i.e. in response to a subpoena or regulatory request).
Other Information We Gather from Your Relationship History and Interactions with Us (described in Paragraph III-D)	
Categories of Information	Personal identifiers; commercial information; inferences drawn from personal information.
Purposes for Collection	To improve our products, services, websites and mobile applications; to track your use of our websites and services; to notify you of information or offers that may be of interest to you; to predict your preferences, interests and future purchases.
Types of Third Parties with Whom We Share	Third Party Service Providers; Third Party Joint Marketing Partners; governmental bodies (i.e. in response to a subpoena or regulatory request).

B. Rights of California Residents.

Under California Laws, California residents can exercise the following rights: (a) to Disclosure and Access; (b) to Deletion of their Personal Information; and (c) to Opt Out of the "Sale" of Personal Information. Each of these rights are described in more detail in Sections VIII, IX, and X below (collectively, "Rights"). These Rights are not absolute and are subject to certain exceptions under the law. For instance, we are not required to delete personal information which is required to provide a service that has been requested by you.

You may exercise your rights under CCPA through an Authorized Agent that is designated according to our procedures. Please email us at privacy@haddenagency.com for additional information.

California residents also have a right not to be discriminated against for the exercise of their Rights. This means, among other things, that we cannot charge you different prices

for services or impose penalties on you because you exercise your rights under CCPA. Certain financial incentive programs may be allowed under the CCPA, if the incentives are reasonably related to the value of customer data.

C. Verification and Recordkeeping.

If you are a California resident, we will process your request to exercise your Rights in accordance with California Laws. When a request is made, we may first take steps to verify your identity to protect your privacy and security. Please contact for more information regarding identity verification requirements. Further, if you designate an Authorized Agent to make a request on your behalf (as described in Paragraph VII-B), you may have to submit information confirming that designation. Subject to California Laws, we will not act upon a request until your identity has been sufficiently verified.

We may maintain a record concerning the requests to fulfill our legal obligations. Further, we may charge a reasonable fee or refuse to act on a request if the request is excessive, repetitive or manifestly unfounded.

VIII. Disclosure and Access Requests

California consumers have the right to request that we disclose to them, for the twelve (12) month period preceding the date of the request: (i) the categories of personal information we have collected about them; (ii) the categories of sources from which personal information is collected; (iii) the business or commercial purpose for the information collection; (iv) the categories of third parties with whom we have shared personal information; and (v) the specific pieces of personal information we hold about an individual. Please note that we are only required to fulfill disclosure and access requests from a consumer twice during any twelve (12) month period.

California consumers can make a disclosure and access request, subject to the exceptions in the CCPA, by contacting our privacy team at (860) 870-5593, extension 103, or by emailing privacy@haddenagency.com.

IX. Deletion Requests

California consumers have the right to have their personal information deleted, subject to certain exceptions (for example, to comply with legal obligations, complete transactions or for our certain internal uses). In the course of fulfilling a valid deletion request, we will also endeavor to direct our service providers to delete your personal information from their records.

California residents can make a personal information deletion request, subject to the exceptions in the CCPA by contacting our privacy team at (860) 870-5593, extension 103, or by emailing privacy@haddenagency.com.

X. Opting Out of the Sale of Personal Information

California and Nevada consumers have the right to opt-out of having their personal information sold. Under the CCPA, the definition of "sale" includes a typical sale (i.e., a transfer of data from a seller to a buyer in exchange for money), but it also includes sharing of personal information with a third party in exchange for anything of value (money or otherwise).

California residents and Nevada residents can opt out from having personal information "sold" to third parties, subject to the limitations of California Laws and Nevada Law, by clicking on the "Do Not Sell My Information" link on our homepage, or by contacting our privacy team by phone at (860) 870-5593, extension 103, or by email at privacy@haddenagency.com.

Subject to applicable law, opting out through this mechanism will not prevent your personal information from being shared with third parties for non-marketing purposes (for example, to process one of your transactions). Further, this opt out mechanism will not prevent the transfer of personal information in connection with a merger, acquisition, bankruptcy or other sale of all or a portion of our assets.

We do not sell the personal information of minors under sixteen (16) years of age.

XI. Security

All of the information that you transmit to us electronically, via phone, or through other means, including personally identifiable information disclosed during registration, is securely protected using SSL (Secure Socket Layer) 128-bit encryption. VeriSign, the world's leading provider of Internet trust services, provides the digital certificate enabling us to employ SSL encryption. Furthermore, we have implemented strict policy guidelines to safeguard the privacy of your personal information from unauthorized access or improper use, and we will continue to enhance our security procedures as new technology becomes available.

XII. What are Your Children's Guidelines?

We do not knowingly collect online contact information or personally identifiable offline contact information about children from children.

We do not entice children by the prospect of a special game, prize or activity, to divulge any information about themselves for any reason. We do not permit children under the age of thirteen (13) to register with our sites, as we do not knowingly accept or store personally identifiable information submitted by children younger than thirteen, nor do we respond to, promote to, market to, or communicate with children known to be younger than thirteen years old.

XIII. Changes to Our Privacy and Security Notice

We reserve the right to amend this Privacy and Security Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated notice on this Site and update the Notice's effective date. Your continued use of our web site following the posting of changes constitutes your acceptance of such changes.

XIV. Contact Information

Questions regarding this Notice, or the ways in which we collect, use, or share your information, or if you wish to exercise your rights under California or any other state law, please do not hesitate to contact us by email at:

privacy@haddenagency.com

Or by writing to:

The Hadden Agency LLC
Attention: Privacy Officer
9 Park St
Vernon, CT 06066

Or call us at:

(860) 870-5593, extension 103