

Privacy Policy

STP Insurance Services LLC (“STP,” “we,” “us,” or “our”), a company organized under the laws of Delaware, USA. We are an insurance services group who provide insurance solutions and create insurance products designed to protect personal income and to help people during financial hardship. We insure those insurance products through Group or Individual Insurance Policies, which are usually fronted by registered and duly licensed insurance carriers in the United States.

A fundamental part of what we do is through trust and security, this means being clear about how we use your information and protecting your privacy. This Privacy Policy explains how we collect, use, and protect your personal information, this policy also explains how you can access the data we process and hold.

By using this website, our service, or enrolling into an insurance policy you consent to our collection and use of your personal information as required and necessary, and you also agree to the practices described in this policy. What data is collected will vary.

Where this policy mentions “You” and “your”, it means the person who is giving this consent, using the product or services, and the person who may be identified on any insurance policy, certificate of insurance, or any other insurance document that you apply for or obtain.

Where this policy mentions “service” and “services”, it may mean customer service, insurance services, or the services we offer on this website.

Why do we collect your personal information?

We collect personal information so you can use the services we provide. Without your personal information, we won’t be able to fulfil our contractual obligations and provide you with all necessary services that we offer.

As an insurance business, we need to obtain information about individuals who are covered in an insurance policy, or individuals that are beneficiaries of an insurance policy, or have made claims under an insurance policy, or in some cases individuals who are involved in an incident giving rise to an insurance claim. This is so that we can properly assess the risks associated with providing insurance, administer insurance, and manage our products and services.

If you subscribe / contract one of our services we may use the information we collect to:

- underwrite insurance;
- make available to you insurance or assistance products or services;
- to provide you with information or services for such products and services;
- to service and administer your insurance policy or provide you with assistance related to our services. This may include, for example: servicing and processing your policy or claims, conducting quality or satisfaction surveys and assessments, keeping electronic or audio records of our interactions and correspondence with you and documents sent and received; and fraud prevention;
- to arrange for the provision of services you request;
- to protect our legal rights or to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements or as otherwise required by law; or
- for purposes to which you’ve otherwise consented.

- to improve our service.

Who collects and controls your personal information?

We may be required by law to collect certain personal information about you, or because of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. You will be informed at the time.

STP is the primary entity responsible for your personal information.

- **As a Data Controller:** We determine why and how your personal information is collected, used, and shared when we provide insurance and reinsurance services.
- **As a Data Processor:** In some cases, we process information on behalf of other entities such as licensed insurance carriers, program partners, or group policyholders. In those cases, we act under our contractual obligations. Processing includes the collection, analysis, recording, organization, storage, of personal data.

What information is collected?

We only save the collected personal information when you enrol into the insurance service. The information collected is considered necessary and legitimate. The information collected is solely for providing the services we provide.

We collect such information as your names, date of birth, email, contact number, home address, annual or monthly earnings, description of the incident leading to the loss, and images of your property. We may require additional information depending on the nature of the service or request, you will be notified at the time of the request.

We do not sell your data.

How do we collect your information?

Through voluntary disclosure you provide us with your personal information when you enrol to insurance services we offer. During the lifetime of our services, we may ask you to provide us with additional information when you communicate with us or when you raise an insurance claim. You are not required by law to provide us your personal information when we are evaluating a claim or request, however, if you choose to decline the requested information, we may not be able to provide our service obligations which may result in claim dismissal.

Sources of the information we collect

We collect personal information from you directly when you voluntarily provide it to us, for instance if you submit request for insurance or contact us.

We also collect your personal information from a variety of sources:

- From other insurance companies that we work with.
- From reinsurance companies.
- From third party claims handlers who are involved in a claim or assist us in investigating or processing claims, including witnesses and external claims data collectors and verifiers.
- From our business partners with whom we work to provide and distribute insurance products.
- From the master group policy holder who may be the business partner we work with to provide and distribute insurance products.
- From public sources, such as public databases (where permitted by law).
- From coverholders, insurance brokers or other intermediaries.
- From third party evidence providers.
- From financial institutions.
- From individuals that you may be associated with (e.g. joint account holders, company employees or directors, family members, etc.).

Occasionally we may collect your personal information from a third party, from authorized, regulatory, public sources such as government regulators, industry self-governing bodies and other publicly available records. This will be most common when we are complying with our legal obligations regarding money laundering and other financial crimes. If appropriate, in these circumstances we will either notify you of our sources or seek your consent to their use.

When do we share your information?

We only use your personal information for legitimate purposes and to fulfil our service obligations. The way insurance works means that your information may be shared and used by several third parties in the insurance sector. For example, insurance agents or insurance brokers, reinsurers, loss adjusters, subcontractors, regulators, law enforcement agencies

When data is shared, all parties must manage information securely and in accordance with secure data processing obligations and privacy standards.

We may use your personal information for the following purposes:

Processing Purpose	Personal Information That May Be Used
Insurance Policy Enrolment	Your name(s), email, date of birth, contact number, home address, annual or monthly earnings, loan amount, employment information, landlord information, IP address.
Customer Service	Your name(s), email, contact number, information relating to your query, and images.
Website Service	Performance Cookies
Insurance Claim	Your name(s), email, date of birth, contact number, home address, annual or monthly earnings, loan amount, employment information, landlord information, insurance loss amount, supporting evidence such as, loss description and images and documents related to loss, IP address.
Regulatory Insurance Report	Home address, email address, annual or monthly earnings, loss amount, date of loss.

This list is not definitive, the description of the information used may include less or additional information, and additional information may be required from time to time depending on the circumstances.

Your Rights

You have certain rights regarding your personal information, subject to local law. These include the following:

Right to Access. You may submit a request to access, the personal information that we have collected about you along with information about our data privacy practices.

Right to Delete: You may submit a request to delete your personal information, doing so may impact our services if not terminated.

Right to Correct: If you believe information we hold on you is inaccurate, you may submit a request to correct inaccuracies in your personal information held by us.

Right of Non-Disclosure: We will not discriminate against you for exercising your rights and choices, however, if you choose to decline our request for information, we may not be able to provide our service obligations which may result in claim dismissal.

Right to Portability: You have the right to receive your personal information in a usable electronic format.

Appeal: You have the right to appeal if for any reason we denied your privacy request.

For any questions or concerns relating to this privacy policy or our data protection practices or if you would like to exercise any of your rights as defined above, please contact us at privacy@micglobal.com

Exercising Your Rights

You can exercise these rights by contacting us at privacy@micglobal.com or contact us through our website www.micglobal.com.

We will respond to your request as required by law (generally within 30–45 days).

Non-personal information

We may automatically collect non-personal information about you such as the type of Internet browsers you use or the website from which you linked to our site. This information and it is only used to assist us in providing an effective service.

When you access our services, we may use cookies for website performance and monitoring purposes. We use Google Analytics to monitor this website, these services use cookies to transmit your IP address.

Information placed on your computer: We may store some information (commonly known as a “cookie”) on your computer when you look at our site. This information facilitates your use of our website and ensures that you do not need to re-enter your details every time you visit it. You can erase or block this information from your computer if you want to (your help screen or manual should tell you how to do this).

Automated decision making

The way we analyse information for the purpose of risk assessment or fraud prevention (may involve customer profiling), means that we access and process your personal information using software that is able to make evaluation and predictions, also known as “automated decision making”. Where there is a need and requirement for human intervention and evaluation, we use reasonable efforts to do so especially in high risk situations.

We may make automated decisions about you:

- We may decide not to offer insurance to you, or we may decide on the types of insurance that are suitable for you, or how much to charge you for our products based on the type of risk under evaluation.
- Where such decisions are required or authorised by law, for example for fraud prevention purposes
- Where you give your consent to us carrying out automated decision-making.

Subject to local legal requirements and limitations, you can contact us to request further information about automated decision-making, object to our use of automated decision-making, or request an automated decision to be reviewed by a human being.

Artificial Intelligence (AI)

We may use AI systems and tools (including generative AI) to support our activities and for different purposes which we explain in more detail below.

Business Processes: We use AI to improve, simplify, and process our internal organisation operations. We may also use Ai to help us summarise information, review image and document form data, or translate information sent by you regarding a request or claim.

Customer Service: We use AI to answer questions you raise through text, chat, or voice call. We use AI to process image data or a document that may be shared to us relating to a claim or support request. We may use to enable us to provide you with a response which may be outside of our normal business operating hours.

Testing & Development: If we use information that has been shared by you for any testing or development of AI, we will anonymise your personal information and do so in accordance with local laws and regulations that protect your privacy. If we use information that has been shared by you for any testing or development of AI, we do so with the intention to provide you with better support and service.

When you are interfacing with an AI, we make it clear that you are doing so. When we process personal information or share your information with 3rd party companies we work with who are listed and named in this policy, we do so on the basis that we have a legitimate interest to do so, we put in safeguards to ensure that your privacy is protected.

AI 3rd party companies:

- <https://www.anthropic.com/company> | <https://www.anthropic.com/legal/privacy>
- <https://www.openai.com/about/> | <https://www.openai.com/policies/privacy-policy/>

Security

We have implemented software solutions and policies to safeguard information and maintain privacy.

We follow security procedures in the storage and disclosure of personal information in line with industry practices, including storage in electronic and paper formats.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at privacy@micglobal.com

Cross Border Transfer

When necessary, your personal information may be transferred outside of your country and stored in another jurisdiction. Where this occurs, we ensure that the organizations receiving and storing your information maintain adequate security and privacy safeguards, including industry best practice compliance and standards.

In some cases, we may be contractually or legally required to transfer your information. This may include transfers to licensed insurance companies, general managing agencies, reinsurance companies, insurance brokers, or other service providers involved in the insurance policy or claim you have purchased.

Data Retention

We keep your personal details for no longer than is necessary in offering the insurance arranged or to comply with our legal or regulatory requirements. We will securely delete or erase your personal information if there is no valid business reason for retaining your data. In exceptional circumstances, we may retain your personal information for longer periods of time if we believe there is a prospect of litigation, in the event of any complaints or there is another valid business reason the data will be needed in the future.

Children's Privacy

Our services are not directed to children under 13 (or under 16 in jurisdictions where higher limits apply), and we do not knowingly collect information from them. If we discover such collection, we will delete the data promptly.

Updates

We are required by law, to change or update this Privacy Policy and to keep it accurate and current as and when required.

Appendix A – State-Specific Privacy Rights

This Appendix supplements our Privacy Policy and applies to residents of certain U.S. states. If you live in one of the states listed below, you may have additional rights under your state's privacy laws. Where state law conflicts with this Policy, your state law will apply.

California (CCPA/CPRA)

If you are a California resident, you have rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA):

- Right to Know what categories of personal information we collect, use, and disclose.
- Right to Access the specific personal information we hold about you.
- Right to Delete your personal information, subject to certain exceptions.
- Right to Correct inaccurate personal information.
- Right to Data Portability to receive your data in a portable format.
- Right to Limit Use of Sensitive Personal Information, if applicable.
- Right to Opt-Out of Sale or Sharing of Personal Information. We do not sell your personal information for monetary value, but we may share information with service providers as permitted by law.
- Right to Non-Discrimination if you exercise these rights.

Colorado (CPA), Connecticut (CTDPA), and Virginia (VCDPA)

Residents of these states have the following rights:

- Right to Confirm whether we process your personal data
- Right to Access the personal data we process about you
- Right to Correct inaccuracies
- Right to Delete personal data provided by or obtained about you
- Right to Data Portability
- Right to Opt-Out of:
 - Targeted advertising
 - Sale of personal data
 - Certain types of profiling

You also have the right to appeal if we decline your request. Instructions on how to appeal will be included in our response.

Utah (UCPA)

Utah residents have similar rights but with some limitations:

- Right to Access
- Right to Delete
- Right to Data Portability
- Right to Opt-Out of the sale of personal data or targeted advertising

Texas (TDPSA)

Texas residents have rights similar to Colorado and Virginia, including:

- Right to Know and Access
- Right to Correct
- Right to Delete
- Right to Portability
- Right to Opt-Out of sale, targeted advertising, or profiling

We will respond to verified Texas consumer requests within 45 days, with a possible 45-day extension if reasonably necessary.

Nevada

Nevada law (NRS 603A) provides a right for residents to opt out of the sale of covered information. STP does not sell covered information as defined under Nevada law.