

Acisure Real Estate Services Privacy Program: FAQs for ARES Partners

This document contains answers to several frequently asked questions pertaining to the Acisure Real Estate Services (ARES) Privacy Program and is intended to serve as a resource for our ARES Partners. The ARES Privacy Program requires that all ARES Partners update their websites to include a link to the ARES Privacy Policy. The Privacy Program also includes a requirement that ARES Partners provide a hard copy set of disclosures to clients of ARES, including the ARES Privacy Policy, the ARES GLBA (Gramm-Leach-Bliley Act) Customer Notice, and, for clients resident in California, a CalFIPA (California Financial Information Privacy Act) opt-out notice.

If you have any additional questions, please contact:

AcisurePrivacyOffice@Acisure.com

How does ARES communicate its Privacy Notice to clients?

As a financial institution, Acisure's and its ARES Partners' collection, use, and sharing of clients' personal information is governed by various privacy-related laws and regulations. Those laws and regulations require Acisure and its ARES Partners to provide certain clients with a notice of privacy practices and, in some cases, the opportunity to opt-out of sharing their personal information.

Acisure and ARES will meet these requirements by providing a **physical** copy of the **ARES Privacy Policy** and a **GLBA Customer Notice** that describes ARES's specific information-sharing practices.

How does this affect me?

All ARES Partners are required to link their websites to: <https://acisure.com/privacy-policy/>. A copy of these instructions is being included along with this FAQ document.

In addition, as of 6/1/22, all ARES Partners must also sunset and stop issuing any of their prior privacy policies/notices/disclosures in any form – only the ARES Privacy Policy, GLBA Customer Notice, and, for California residents, CalFIPA notice must be provided to clients on or after 6/1/22.

What if clients contact me with questions asking for more information about the ARES Privacy Program. How should we proceed?

The Acisure Privacy Office team is here to support you in responding to questions about Acisure's Privacy Program, including the Privacy Policy. If you receive questions and need assistance responding, please contact AcisurePrivacyOffice@Acisure.com.

Why does Acrisure manage the ARES Privacy Program at the Home Office level (i.e., by the Acrisure Privacy Office)?

Data is at the heart of innovation, and companies that use data responsibly and intelligently have enjoyed a competitive edge. To continue to spur innovation as well as keep us compliant in the changing landscape of privacy laws and regulations, we developed the Acrisure Privacy Program so that Acrisure can manage the process in a centralized manner to include all our ARES Partners. This helps ensure that we have clear standards and disclosures on our data sharing practices and also remain current and compliant with changing laws and regulations. We also want to assume the operational burden of the tasks associated with privacy notices, data subject requests, and other technical requirements as Home Office service to our ARES Partners.

What does the ARES Privacy Policy permit Acrisure and ARES to do?

The ARES Privacy Policy and GLBA Customer Notice have been drafted to be as flexible as possible given Acrisure's current and anticipated data initiatives and considering the legal and regulatory obligations to which we are subject. To that end, in general, the ARES Privacy Policy allows Acrisure and its ARES Partners to share clients' data with affiliates and non-affiliates in most cases, subject to clients having the right to opt-out of sharing with non-affiliates and California residents having the right to opt-out of sharing with affiliates. For these purposes, an "affiliate" is defined as a third party that is at least 25% controlled by or under common control with Acrisure, LLC.

What are clients' rights under the ARES Acrisure Privacy Program?

For individual clients residing in all states except California, in general, they have the right to opt-out of ARES Partners' data sharing of their personal information with non-affiliates; they do not have a legal right to opt-out of Acrisure's or ARES Partners' data sharing with their affiliates. For individual clients residing in California, they have the right to opt-out of Acrisure's and ARES Partners' data-sharing with affiliates; at this time, Acrisure does not plan to share data of individual clients residing in California with non-affiliates.

Clients may submit their opt-out requests by either visiting <https://acrisure.com/privacy-policy/privacy-requests>, contacting (877) 504-9487, or writing to Acrisure at our Home Office address, all of which is identified in the ARES Privacy Policy.

I have clients who reside in California. Does the California Consumer Privacy Act (CCPA) apply to me and what do I need to know?

Please see our ARES CCPA FAQ document that accompanies this FAQ document for general information on the CCPA as well as information specific to Acrisure's implementation of the CCPA's requirements.

Last updated: May 2022