



Privacy Policy

Effective Date April 5, 2023

This Privacy Policy covers Savvy Insurance Solutions, LLC's ("Savvy," "we," "us," "our") policies on the collection, use, and disclosure of personally identifiable information and/or personal information, as defined by applicable law (collectively "Personal Information"), when visitors and customers (collectively "Users") access, use, or otherwise interact with savvy.insure (the "Site") and the software and services made available through the Site (collectively the "Services").

[Section 8.A.](#) is intended to provide the Notice of Collection required under the California Consumer Privacy Act.

By optionally providing your Personal Information and insurance information, you consent to the collection, use and disclosure practices identified in this Privacy Policy.

1. Personal Information Collected by Savvy

- **Non-Public Information.** Savvy collects non-public personally identifiable information ("NPI"), which is information that identifies you and is not available to the public.
- **Application Information.** To obtain offers for you, Savvy may collect your name, address, phone number, email address, social security number, driver's license, date of birth, and marital status. Savvy will utilize email and/or phone numbers to communicate with you regarding offers, quotes or applications.
- **Payment Information.** To make payments for the insurance products and services, Savvy may collect debit or credit card account information, email and other information to verify your identity, such as name, address, telephone number, and/or date of birth. Savvy does not itself store debit or credit card information on its servers, but utilizes a secure vault service to benefit the security of your personal payment information.
- **Transactional Information.** Savvy may receive information about your transactions with us, our affiliates, or others, including your insurance coverage, limits and rates, and payment and claims history. It also includes information that we require for billing and payment.
- **Information from Third Parties.** Savvy may obtain aggregated public records from third parties, such as data brokers and government agencies, in order to market and/or provide services to our customers. Savvy may receive Personal Information from consumer reporting agencies, which provide us with motor vehicle reports, real property records, claim reports, and/or credit information where permitted by law. Such information is used for prefill of an insurance application, or generation of an estimated premium cost for insurance for marketing



purposes and you will have the opportunity to review and correct any incorrect or inaccurate data contained within that application.

- **IP Address.** A user’s IP address is identified and logged automatically in our server log files whenever you visit the Site, along with the time of the visit, the page(s) that were visited, and the actions taken on those pages. Savvy uses IP addresses for calculating usage levels of the Site, helping diagnose server problems, and administering the Site and Services.
- **Web Beacons.** Pages of our Site and/or emails from Savvy may contain small electronic files known as web beacons that permit Savvy, for example, to count users who have visited those pages or opened an email and for other related Site statistics.
- **Cookies.** The Site uses cookies to provide users with a better browsing experience. In addition, by accepting Savvy’s Privacy Policy, you are consenting to Savvy’s use of cookies in connection with your use of the Site. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and transferred to your device. You can set your browser to remove or reject cookies; however some Site features or Services may not work properly without cookies.
- **How You Can Control Advertising Cookies.** Cookies are also utilized to deliver advertising on our site. Among other uses, they allow us to show more relevant advertising to people who visit the site by showing you ads that are based on your browsing patterns and the way you have interacted with our sites. You can find information about how to opt out of the cookies provided by our advertising partners here:
 - **Google Display Network.** Google Display Network targets advertisements to Site Users. Users can manage ad settings on [Google Advertising Opt-Out](#) and revisit their privacy preferences on Google’s [Privacy Checkup](#) tool.
 - **Meta Advertising.** Meta may use cookies, web beacons, and other storage technologies to collect or receive information and use that information to provide measurement services and target ads. Savvy may use “Visitor action pixels” from Meta on the Site. This allows user behavior to be tracked after they have been redirected to the provider’s website by clicking on a Meta ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, i.e., we do not see the Personal Information of individual users. Please see the [Meta Privacy Policy](#) for additional information. Users can opt-out of the collection and use of information for ad targeting. To opt-out, go to Privacy Settings through your Facebook account and opt out under the Ad Preferences settings.

Even if you opt out of cookies/ads personalization, you may still see ads based on factors such as your general location derived from your IP address, your browser type, and your search terms. You can also manage cookies for any online advertising service via the consumer choice tools created under self-regulation programs, such as the US-based [aboutads.info choices](#) page, the [Network Advertising Consumer Opt-Out](#) and/or the [Digital Advertising Alliance Opt-Out](#).



2. Personal Information Received by Savvy or Disclosed or Shared by Savvy

Personal Information is collected to facilitate the Services offered, for marketing of our Services and products, or for internal analysis relating to product improvements and data security.

Provide Savvy Services. Personal Information is collected to facilitate provision of the Services on the Site to:

- Provide, operate, and improve the Site and Services;
- Process and fulfill your request for products and services, such as insurance offer comparison
- Process payments and complete transactions;
- Communicate with you regarding our products and services;
- Respond to inquiries and provide customer support and feedback;
- Detect, prevent, and investigate security incidents that compromise the availability, authenticity, integrity or confidentiality of stored or transmitted Personal Information;
- Protect against malicious, deceptive, fraudulent or illegal activity directed at Savvy;
- Debug to identify and repair errors that impair existing intended functionality;
- Analyze data to assess, understand and improve the services and personalize user experiences, including creation of anonymized aggregated, statistical and benchmark data. Aggregated data is utilized to help develop and market products or services and present targeted content and advertising;
- Enable functionality of the services to authenticate a user, prevent fraud, and implement security measures;
- Undertake activities to verify or maintain the quality of a service or product that is developed or provided, and to improve, upgrade, or enhance any service or product that is developed or provided by Savvy.

Share with Service Providers. Savvy has engaged with service providers to facilitate the Savvy services and operate our business, including without limitation, database management, hosting, information technology, email/SMS delivery, customer support, analytics, and data security and compliance services necessary to provide the Savvy services. For each service provider, Savvy will have in place written contracts that describes the purpose of the service and disclosure of Personal Information, and requires the service provider to both keep the Personal Information confidential and not use it for any purpose except performing the services pursuant to such contract.

Offer Comparison Services. With respect to Savvy's rate comparison services:

- Savvy utilizes Trellis Technologies, Inc., as a digital solution to enable customers to provide insurance information from their current insurer. By identifying your current insurance provider and providing your consent to collection and the [Trellis End User Privacy Policy](#), Trellis will share NPI with Savvy to enable Savvy to provide the requested insurance offer comparison services.
- By connecting Savvy with your insurance provider, you are requesting and authorizing Savvy to disclose NPI within your insurance policy, as well as related terms and rates, to third party insurers, insurance agency partners, and consumer report services to generate and calculate accurate quotes. Information will be shared with those partners whose quotes you affirmatively select and, except to the extent a state resident has opted out in accordance with Section 8.B., with insurance marketing partners to the extent permitted by third party carriers and applicable law.



SMS Notifications – Notice & Consent. Savvy utilizes a service provider to enable SMS notifications. You consent to receive recurring text messages relating to the Services at the mobile number associated with your account or otherwise provided to Savvy. You understand and agree that text messages sent to your mobile number may be generated using automated technology, Message and data rates may apply. Reply STOP to opt-out or HELP for info. Consent is not a condition of any purchase.

Analytics: Savvy uses the following analytics services:

- **Google Analytics:** Savvy utilizes Google Analytics for data analytics to generate insights and recommendations. Users can manage ad settings on [Google Advertising Opt-Out](#) and revisit their privacy preferences on Google’s [Privacy Checkup](#) tool.
- **Amplitude.** Amplitude collects User data and information regarding the behavior and usage patterns of Users of the Site. If you wish to opt out of sharing, you may adjust your cookie preferences settings.
- **FullStory:** FullStory records user sessions on their website, enabling meaningful insight into users’ experience, as an effective way to identify usability problems and other areas for improvement. For more information on the privacy policy of this service, please see: [FullStory Privacy Policy](#) and its [Acceptable Use Policy](#). If you wish to prevent all websites using the FullStory Services to be able to record activity, you can [opt-out](#) of the FullStory Services. Opting out will create a cookie that tells FullStory to turn off recording on any site which uses the FullStory Services. **The presence of this cookie is required to continue opting out, so if you clear your browser cookies, you will have to opt-out again.**
- **Looker.** Savvy utilizes Looker, a data analytics Site, that enables Savvy to obtain insights on User behavior on the Site. Users can manage ad settings on [Google Advertising Opt-Out](#) and revisit their privacy preferences on Google’s [Privacy Checkup](#) tool.
- **Impact Analytics.** Savvy utilizes the services of Impact Analytics, Inc. as a method for our affiliates to track a User’s progress through the Savvy Site experience. Personal information is not shared with affiliates, but rather Impact will generate a unique user token to share with Savvy affiliates. Under certain circumstances, affiliates may be able to use the unique user token to corroborate a User’s identity with the affiliate’s own internal records.
- **Datadog.** Savvy utilizes Datadog, a SaaS based monitoring and analytics platform to obtain analytics, service application and infrastructure logs. Please see the [Datadog Privacy Policy](#) and [DataDog Cookie Policy](#) for additional information regarding your cookie preferences.
- **Sentry.** Sentry provides real-time error-tracking to help improve our Services. Please see [Sentry Privacy Policy](#)
- **Kustomer.** Savvy utilizes Kustomer for customer engagement purposes. Please see [Kustomer Cookie and Privacy Policy](#) for information on how to adjust your cookie preferences.

Compliance and Protection. Personal Information may be disclosed to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) if Savvy is involved in a merger, acquisition, or sale of all or a portion of its assets, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify you about law enforcement or court ordered requests for data unless otherwise prohibited by law.

3. Personal Information of Minors



Savvy does not knowingly collect Personal Information on the Site from anyone under the age of 16. If we learn we have collected or received Personal Information from anyone under the age of 16 without verification of parental consent, we will delete that information. If a parent or guardian becomes aware that his or her child under the age of 16 has provided Savvy with Personal Information without their consent, he or she should contact Savvy at legal-notices@savvy.insure. Savvy will delete such Personal Information from our files within a commercially reasonable time, but no later than required under the applicable law.

4. Retention and Deletion of Personal Information; De-Identified Data

Unless erasure is otherwise requested under applicable law or as otherwise stated in this Privacy Policy, Savvy will retain account data as long as it is necessary to provide services to our customers. Personal Information obtained from Site visitors will be maintained as long as it is necessary to provide requested communications and information-based services or until a visitor exercises the right to opt-out of requested communications or information-based services. Anonymized and pseudo-anonymized data will be retained as long as Savvy determines such data is commercially necessary for its legitimate business interests. To the extent Savvy de-identifies any Personal Information, Savvy shall maintain and use such de-identified data without attempting to re-identify the data.

5. Savvy's Security Practices

We have implemented reasonable administrative, technical and physical security measures to protect Personal Information against unauthorized access, destruction or alteration. However, although we endeavor to provide reasonable security for Personal Information we process and maintain, no security system can ever be 100% secure.

6. Response To "Do Not Track" Signals

"Do Not Track" is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-website user tracking. The Site will respond to any requests received pursuant to a user-enabled [Global Privacy Control](#).

7. Changes to this Privacy Policy

If we make material changes to our Privacy Policy, we will notify you by (1) changing the last updated date within the Privacy Policy, *or* (ii) sending an electronic notification to all customers, *or* (iii) adding a banner/notification to the Site itself.

8. Supplemental U.S. State-Specific Notices

This supplemental notice sets forth the disclosures and rights applicable to residents of California, Colorado, Virginia, Connecticut, and Utah pursuant to the California Consumer Privacy Act of 2018, Civil Code sections 1798.100 et seq ("CCPA"), the Colorado Privacy Act and its implementing regulations ("CPA"); the Utah Consumer Privacy Act ("UCPA"); and the Virginia Consumer Data Protection Act of 2021, as amended, VA Code Title 59.1 a chapter numbered 52, consisting of sections numbered 59.1-571 through 59.1-581 ("VCDPA"). Such consumer privacy notices and rights shall also apply to other state residents to the extent other state consumer privacy laws are implemented following the last effective update to this Privacy Policy.

Sections B-K of this Supplemental U.S. State Specific Notice does not apply to NPI collected with



respect to Savvy's offer of insurance products to consumers, which is governed by its obligations pursuant to the Gramm-Leach-Bliley Act ("GLBA").

A. **Notice of Collection:** Savvy collects, uses and discloses, and in the preceding 12 months has collected, used and or disclosed, Personal Information as follows:

Categories of Personal Information:

- Identifiers, such as a name, postal address, unique personal identifiers, email address, account username and password, telephone number, insurance policy number, account name, social security number, gender, driver's license number, and other similar identifiers.
- Driving and claims history, including information about any prior accidents or insurance claims.
- Vehicle information, such as a vehicle identification number (VIN), vehicle details, including any customizations, and vehicle photos.
- Real Property records;
- Professional and Employment related information;
- Education-related information;
- Financial identifiers, such as a bank account number, credit card number, debit card number, or other financial information.
- Medical information contained within your insurance policy file.
- Commercial information about consumer transactions and experiences with us and others, such as payment history, claims, coverage and vehicle changes.
- Site usage and device information, such as search and browsing history, online identifier(s), Internet Protocol address, search history, and information regarding how users interact with our Site and online advertisements.
- Geolocation data.

Sources of Collection: Savvy collects each of the above categories from a variety of sources, including, directly from Users (either online, by phone, or by email), from service providers with your consent, data brokers, analytics providers, credit reporting agencies, public records, social networks, advertising and marketing partners, and insurance agents, brokers and providers.

Purpose of Collection and Disclosure: Savvy collects each of the above categories of information for purposes of:

- Performing services, including providing quotes for insurance, processing applications, providing customer service, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services;
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Communications with you regarding products and services offered by Savvy and its partners.



- To assess and improve our product and service offerings, including the development of new products and services.
- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

Categories and Purposes of Disclosure: Savvy discloses the above categories of Personal Information to:

- Service providers that assist us in providing insurance-related services;
- Service providers involved in our verification, data-processing, risk-assessment, security and anti fraud efforts;
- Insurance providers for purposes of offering quotes and information regarding insurance products and services;
- Third party advertising and marketing partners;
- State insurance departments and other governmental and law enforcement authorities to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (3) enforce our agreements with you, and/or (4) investigate and defend ourselves against any third-party claims or allegations.

Savvy does not retain a consumer's Personal Information for longer than is reasonably necessary for each disclosed purpose.

B. Sale of Personal Information; Sharing of Personal Information

Savvy does not sell your Personal Information and does not share your Personal Information for a commercial purpose. Savvy does not use your Personal Information for cross-context behavioral advertising.

C. Collection of Sensitive Information

Savvy does not collect Sensitive Information for purposes other than for purposes permitted under the CCPA.

D. Consumer Rights. Consumers may contact Savvy to exercise the following consumer rights:

1. Request Savvy Disclose At No Charge (“Right to Know”):

- Specific pieces of Personal Information it has collected about you;
- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected;



- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared; and

Right to Know Requests can be submitted to Savvy by email at legal-notices@savvy.insure.

2. **Request Savvy to Delete At No Charge (“Right to Delete”):**

Deletion Requests can be submitted to Savvy by email at legal-notices@savvy.insure or by mail to Savvy at: Savvy, Inc., Attention: Privacy Request to Delete, 2093 Philadelphia Pike #7288, Claymont DE 19703 or by email at legal-notices@savvy.insure.

E. **Request Savvy Correct At No Charge (“Right to Correct”):**

Requests that Savvy correct any inaccurate Personal Information collected by Savvy can be submitted by email to legal-notices@savvy.insure.

F. **Verified Request Process**

Savvy will verify all consumer requests prior to taking any action in response to such request. For consumers that maintain an account with Savvy, it may verify the identity of the consumer making the request by either matching information with the account information on file or through existing account authentication credentials.

Under applicable state law, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. Authorized agents must demonstrate they have written authorization from you to make requests on your behalf. Savvy may additionally require the consumer to confirm their identity and verify the authorized agent’s permission before complying with any request.

G. **Consumer Request Limitations**

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the applicable state laws, including, but not limited to:

- Savvy is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a Personal Information request twice in a 12-month period.
- Deletion is not required if it is necessary for Savvy to maintain the Personal Information to fulfill applicable permissible purposes enumerated pursuant to applicable state law.

Savvy will confirm and respond to all requests within the timeframe required under applicable state law. In responding to any request to disclose/delete, Savvy shall maintain a record of the requests as required under applicable state law.

H. **Non-Discrimination Policy**



You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA and VCDPA. Savvy shall not discriminate against a consumer for exercising any statutory consumer privacy rights, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Savvy for the Personal Information, (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services, or (d) providing a different level of quality of goods/ services.

Employees, applicants and independent contractors have the right not to be retaliated against for the exercise of their CCPA rights.

I. Your Virginia Privacy Rights under VCDPA

If Savvy is unable to process requests relating to your Personal Information and denies your request, Virginia residents have the right to appeal by emailing Savvy at legal-notices@savvy.insure. Savvy will respond to your appeal request within 60 days of receiving the request to appeal.

J. Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581

California law permits Consumers to request and obtain from Savvy once a year, free of charge, certain information about their Personally Identifiable Information (“PII”) (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

K. Accessibility of this Policy

- You can download and print a copy of this Notice as a separate document.

9. Contact Us

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: **Savvy, Inc., Attention: Privacy Department, 2093 Philadelphia Pike #7288, Claymont DE 19703** or by email at legal-notices@savvy.insure.

This Privacy Policy was last updated on April 5, 2023