

This California Privacy Policy describes Hornor, Townsend & Kent, LLC (“HTK,” “we,” “us,” or “our”) practices regarding the collection, use, and disclosure of the personal information of California residents (“Consumers”), describes the rights of Consumers under the California Consumer Privacy Act of 2018 (“CCPA”), and explains how Consumers may contact HTK to exercise those rights. This policy only applies to the personal information of Consumers (i.e., California residents).

Consumer Rights

This section describes certain rights of Consumers under the CCPA. For information on how Consumers may contact HTK to exercise these rights, please see the section below entitled, “How to Submit a Request.”

Right to Know

A Consumer has the right to request that a business disclose what personal information it collects, uses, discloses or sells. Specifically, a Consumer may request that a business that collects personal information about the Consumer disclose to the Consumer the following:

- (1) The categories of personal information it has collected about that Consumer.
- (2) The categories of sources from which the personal information is collected.
- (3) The business or commercial purpose for collecting or selling personal information.
- (4) The categories of third parties with whom the business shares personal information.
- (5) The specific pieces of personal information it has collected about that Consumer.

A Consumer may request that a business that sells the Consumer’s personal information, or that discloses it for a business purpose, disclose to that Consumer:

The categories of personal information that the business collected about the Consumer.

- (1) The categories of personal information that the business sold about the Consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.
- (2) The categories of personal information that the business disclosed about the Consumer for a business purpose.

Right to Request Deletion

A Consumer has the right to request that a business delete any personal information about the Consumer which the business has collected from the Consumer. If it is necessary for HTK to maintain the personal information for certain purposes, HTK is not required to comply with your deletion request. If we determine that we will not delete your personal information when you request us to do so, we will inform you and tell you why we are not deleting it.

No Discrimination

A Consumer has the right not to be discriminated against because the Consumer exercised any of the Consumer’s rights under the CCPA. HTK may charge a Consumer a different price or rate, or provide a different level or quality of goods or services to the Consumer, if that difference is reasonably related to the value provided to the Consumer by the Consumer’s data.

How to Submit a Request

To exercise the rights described above, you must submit a verifiable Consumer request to us by contacting HTK through one of the following methods:

- Calling 1-800-873-7637 (Option 2) or
- Filling out the following online form: www.htk.com/ccpa-request-form

You may submit a request as frequently as you would like, but we are not required to respond to requests to provide personal information to you more than twice in any 12-month period.

To submit a verifiable Consumer request, you will be asked to provide certain information to help us verify your identity. The information we ask you to provide to initiate a request may differ depending upon the type of request, the type, sensitivity and value of the personal information that is the subject of the request, and the risk of harm to you that may occur as a result of unauthorized access or deletion, among

other factors. In certain circumstances, we may also require you to provide a written declaration that you are who you say you are.

You may make a verifiable Consumer request on behalf of your minor child. You may also designate an authorized agent to make a request on your behalf. Upon request, your authorized agent must provide proof of identity and authority to speak on your behalf.

If we cannot verify your identity or authority to make the request, we will not be able to comply with your request. We will inform you if we cannot verify your identity or authority. We will only use personal information provided in a verifiable Consumer request to verify the requestor's identity or authority to make the request.

Types of Information Collected

HTK has collected the following categories of Personal Information about Consumers in the twelve (12) months prior to the Effective Date of this Policy:

- Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.
- Characteristics of protected classifications under California or federal law (Race, color, national origin, religion, gender (including pregnancy), disability, age (at least 40 years old), citizenship status, sexual orientation, gender identity and gender expression).
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information.
- Education information.
- Inferences drawn from any personal information to create a profile about a Consumer reflecting the Consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How Information is Collected

HTK collects the personal information described above from the following categories of sources:

- From you directly, when you provide us with information over our websites or in person, in applications or questionnaire responses you submit in connection with one of our products or services, when you provide information about yourself to one of our Financial Professionals.
- From others on your behalf, such as when you are named as a beneficiary or emergency contact of one of our employees or associated with a policy held by one of our clients.
- From financial services organizations who provide us with information about purchase and sale transactions made by you or on your behalf.
- From data aggregators who provide us with information about individuals in order for us to understand who may be interested in our products or services.
- From public records or published databases.

Use of Collected Information

HTK collects the personal information described above for a variety of business purposes. HTK uses the personal information to:

- Provide our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services;
- Improve, upgrade, or enhance our products and services;
- Provide you with information about products and services that we and other businesses may provide that we think may be of interest to you;
- Detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debug to identify and repair errors that impair existing functionality;
- For research and analysis purposes.

When Information is Disclosed

HTK may share the personal information described above with the following categories of third parties:

- We share your personal information with our service providers to assist us in providing our products and services to you, including service providers that:
 - host our databases, infrastructure and websites;
 - provide analytics services to help us understand the activity on our website;
 - assist us with marketing and communications with our clients or potential clients;
 - assist us to analyze and understand the financial status and needs of our client base;
 - assist us with the financial, regulatory and legal aspects of our business,
 - assist us with quote and estimates specific to particular individuals interested in our products or services;
 - assist us with event planning; and
 - assist us with data security and privacy.
- With courts or governmental entities as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process.

HTK has not sold Personal Information about Consumers in the twelve (12) months prior to the Effective Date of this Policy.

HTK has disclosed Personal Information about Consumers for a business purpose in the twelve (12) months prior to the Effective Date of this Policy.

HTK has disclosed the following categories of Personal Information about Consumers for a business purpose in the twelve (12) months prior to the Effective Date of this Policy:

- Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.
- Characteristics of protected classifications under California or federal law (Race, color, national origin, religion, gender (including pregnancy), disability, age (at least 40 years old), citizenship status, sexual orientation, gender identity and gender expression).
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information.

- Education information.
- Inferences drawn from any personal information to create a profile about a Consumer reflecting the Consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Contact for More Information

If you have any questions or concerns about HTK's privacy policy and practices, please contact:

Honor, Townsend & Kent, LLC
600 Dresher Road
Horsham, PA 19044
Phone: 800-873-7637 (Option 2)
Email: privacy@pennmutual.com

Effective Date: January 1, 2020