

Online Privacy Policy

MAGNA CARTA COMPANIES, a group of affiliated companies which includes the property and casualty insurance companies Public Service Insurance Company, Paramount Insurance Company and Western Select Insurance Company (collectively, “MCC,” “we,” “our” or “us”) has created this online privacy policy (the “Policy”) for its website www.mcarta.com and its online *Payment Center* (collectively, the “Site”). The following discloses MCC’s information gathering and dissemination practices for the nonpublic personal information we collect. That type of information is described below in **Information We Collect**. We encourage you to read this Policy before using the Site. Your use of the Site signifies that you agree with all terms of this Policy, so please do not use the Site if you disagree with any part of this Policy.

HOW WE PROTECT YOUR INFORMATION

At MCC, our customers are our most valued assets. Protecting your privacy is important to us. We restrict access to nonpublic personal information about you to those individuals and entities, such as our employees and risk management service companies and your insurance agent or broker (who is also known as an “insurance producer”), who assist us in providing our products and services. We require those individuals and entities to whom we permit access to your nonpublic personal information to protect it and keep it confidential. We maintain physical, electronic and procedural safeguards that comply with applicable regulatory standards to guard your nonpublic personal information in our possession.

We do not disclose any nonpublic personal information about you, as our customer or former customer, except as described in this Policy.

INFORMATION WE COLLECT

We collect and maintain information about you to provide you with the coverage, products or services you request and to manage your account.

We collect certain information (“nonpublic personal information”) about you and the members of your household (collectively, “you”) from the following sources:

- Information we receive from you or your insurance producer on applications or other forms, such as your social security number, name and address, assets, income and property information;
- Information about your transactions with MCC, our affiliates or others, such as your policy coverage, premiums and payment history;
- If you pay your invoice online through our *Payment Center*, then we receive from you financial information, such as credit card numbers and bank account numbers;
- Information we receive from a consumer reporting agency or insurance support organization, such as motor vehicle records, credit report information and claims history; and
- If you are a claimant, the information we receive from you may include work experience and other details of your personal life, such as your date of birth and medical information regarding diseases or physical conditions from medical professionals who have provided care to you.

INSURANCE PRODUCER AND INSURANCE PRODUCER PORTAL

MCC believes that its insureds and potential insureds are best served by working with an insurance producer to procure insurance policies from MCC insurance companies. MCC does not sell insurance directly to the public. Your insurance producer has access to MCC's producer portal on the Site, through which your insurance producer may conduct insurance transactions on your behalf. You should discuss with your insurance producer what information your producer will and will not submit to MCC through the Site.

INFORMATION WE DISCLOSE

MCC may disclose nonpublic personal information as described above in **Information We Collect**, to companies that perform services on our behalf or to other third party vendors we contract with, all as permitted by law.

Many employer benefit plans and plan sponsors restrict the information that can be shared about their employees or members with companies that provide them with products or services. If you have a relationship with MCC or one of its affiliates as a result of products or services provided through an employer benefit plan or plan sponsor, we will abide by the privacy restrictions imposed by that entity.

We are permitted to disclose nonpublic personal information about you: (1) to process your transaction with us, for instance, to determine eligibility for coverage, to process claims or to prevent fraud; (2) with your written authorization; and (3) as otherwise permitted by law.

SHARING INFORMATION WITH AFFILIATES

MCC may disclose nonpublic personal information as described above in **Information We Collect**, to our affiliates, which include insurance companies and insurance producers.

We are permitted by law to share with our affiliates our transaction and experience information about you in order to provide you with the coverage, products or services you request and to manage your account.

In addition, we may share with our affiliates information from consumer reporting agencies, including credit reports, and certain application information that we receive from you and from third parties including insurance support organizations.

SHARING INFORMATION WITH NON-AFFILIATES

We may share your nonpublic personal information as described above in **Information We Collect**, with non-affiliates that assist us in servicing your insurance policies. Examples of such services are administration (billing and collections), risk management, underwriting and claims handling services. We may also share your nonpublic personal information with non-affiliates for the purpose of detecting and preventing fraud, as directed or authorized by you or as otherwise permitted or required by law.

We may also share your nonpublic personal information with certain governmental and regulatory entities, but only to the extent required by law. Examples include state Workers Compensation Boards and the U.S. Department of Health and Human Services which administers Medicare.

Because we do not share nonpublic personal information with either affiliates or non-affiliates in any way except as described in this Policy, there is no need for an opt-out process in our privacy procedures.

For California and Vermont Residents: If it becomes necessary to share your nonpublic personal information with non-affiliates other than as specifically allowed by law, we will not do so without first obtaining your permission.

MAINTAINING PERSONAL INFORMATION

We maintain procedures to ensure that the nonpublic personal information we collect is accurate, up-to-date and as complete as possible. If you believe the information we have about you in our records or files is incomplete or inaccurate, you may request that we make additions or corrections, or if it is feasible, that we delete this information from our files. You may make this request in writing to (include your name, address and policy number):

Attn: **Chief Privacy Officer:**
One Park Avenue, 15th Floor
New York, New York 10016

Or by email to: privacy@mcarta.com or by telephone at: 1-888-ONE PARK extension 9269 or 212-591-9269.

Special Notice: You can obtain access to any nonpublic personal information we have about you if you properly identify yourself and submit a written request to the address above describing the information you want to review. We will also tell you the identity, if recorded, of persons to whom we have disclosed your nonpublic personal information within the preceding two years.

You may request that we correct, amend or delete information about you. If we do so, we will notify organizations that provided us with that information and, at your request, persons who received that information from us within the preceding two years. If we cannot grant your request to correct, amend or delete the information, you may provide us a written statement of the reasons you disagree, which we will place in your file and give to the same parties who would have been notified of the requested change.

MODIFICATIONS TO THE PRIVACY POLICY

MCC reserves the right to change this Policy in the future. If we do that, you will be notified of the revised privacy policy.

GENERAL STATEMENT

MCC's policy is to protect the confidentiality of the nonpublic personal information that you provide, and to limit access to that information only to those with a need to know. MCC may collect your name, address, phone number and e-mail address at this Site. We will use this information to provide you with information you request, to refer you to a MCC insurance producer, to refer you to a third party service provider or to comply with a legal requirement. **When you encounter a screen in this Site that asks for**

information you do not want us to have or use, you should not proceed further with that screen. For further information, please see the Terms and Conditions at www.mcarta.com.

HYPERLINKS

MCC has agreements with third parties that allow you to go to their websites from our Site. If you go to a website from our Site, you may be asked to give nonpublic personal information for access to services or products offered by the host of that website. You may become a part of that business' customer base and be subject to its policies regarding the handling of customer data.

Please be aware that MCC is not responsible for the privacy practices of those websites. We encourage you to be aware of this when you leave our Site and to read the Privacy Statements of each and every website that you visit, as the privacy policies associated with those websites may differ from ours. Our Policy applies solely to our Site.

COOKIES

A cookie is a message sent to your browser from a web server that is stored on your computer's hard drive. The message is sent back to the web server whenever the browser requests a page from that server. Many commercial websites use cookies. While a code in the cookie file enables the website to label you as a particular user, it does not identify you by name or address unless you have provided the website with such information or set up preferences in your browser to do so automatically. On occasion MCC may use cookies (which may be provided by a third party operating on our behalf) to help us analyze traffic or to improve your Site navigation experience. To facilitate the analysis, an identification is assigned to help us uniquely identify you each time you return to the Site. One of the major concerns about stored cookies is the fear that they may contain personal information and information identifying you that could be accessed by other websites. MCC only stores a randomly chosen unique identification number and a context, both of which are meaningless to others but help us to identify you.

MCC wants to be sure you understand that accepting a cookie in no way gives us access to your computer or any nonpublic personal information about you, other than the information you choose to share. This practice is strictly enforced. While acknowledging the concerns that some visitors have about cookie usage, we believe that the benefit visitors to the Site gain from the use of cookies is worthwhile.

SECURITY AND EMAIL TRANSMISSIONS

Our policy is to limit access to nonpublic personal information about you only to those who need to know that information to provide products or services to you or to provide necessary technical support. We require our employees with access to your nonpublic personal information to use safeguards against unauthorized access or use and unlawful disclosure. We require our employees to adhere to high standards of ethics and integrity in performing their jobs and conducting business. We also require the same standards of confidentiality from the service vendors that assist us. To ensure the security of your nonpublic personal information that you submit to MCC electronically, including information submitted through the *Payment Center* (other than via an e-mail message), security software is used to encrypt (data scrambling) the information before and during its transmission through the internet. We only allow information to be submitted for transmission if your browser is compatible with our security software. If your browser is not compatible, you will receive a message indicating your transaction can be completed, but at a lower level of security. We do not encrypt the public portions of the Site. **If you are on any**

website that asks you for confidential information, you should check to see if the information being transmitted is encrypted in order to increase the security of your information. E-mail messages are not secure. E-mail messages traveling through the internet are subject to viewing, alteration and copying by potentially anyone on the internet.

You should exercise discretion with respect to the submission of any nonpublic personal information via e-mail. If you are concerned about the security of your communication, you are encouraged to send your correspondence through the postal service or use the telephone to speak directly to us. We are not responsible for the security or confidentiality of communications you send to us through the internet using e-mail messages.

RIGHT TO PRESERVE AND DISCLOSE

MCC may preserve for any period of time it deems appropriate all nonpublic personal information you provide. MCC may also disclose nonpublic personal information you provide if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to: (a) complete your transaction; (b) comply with legal process; (c) comply with or enforce the terms of this Policy; (d) respond to claims that any materials on the Site violate your rights or the rights of third parties; (e) protect the rights, property or personal safety of MCC, its users and/or the public; or (f) effectuate a transaction in which all or substantially all of the equity or assets of MCC are acquired by a third party.

NOTICE TO CONNECTICUT CLAIMANTS CONCERNING THE COLLECTION OF SOCIAL SECURITY NUMBERS

We comply with Connecticut's General Statutes, Title 42, § 42-470 and § 42-471, and do not do any of the following, which are prohibited or restricted by § 42-470 in that state:

- (1) We do not publicly post or publicly display in any manner an individual's Social Security number;
- (2) We do not print an individual's Social Security number on any card required for the individual to access products or services provided for that person;
- (3) We do not require an individual to transmit that individual's Social Security number over the internet; even though Connecticut law permits us to gather such information on a secure connection or where the Social Security number is encrypted; and
- (4) We do not require an individual to use his or her Social Security number to access an internet website, even though Connecticut law permits us to establish a password or unique personal identification number or other authentication device to access a website

We do collect, use and release Social Security numbers as required by state or federal law, and for internal verification, investigation, and administrative purposes. We refer you to § 42-470 (d), which provides: "This section does not prevent the collection, use or release of a Social Security number as required by state or federal law or the use of a Social Security number for internal verification or administrative purposes."

We collect Social Security numbers on all claimants who have made a claim for bodily injury, medical expenses or workers compensation, with our companies. Not only is this information necessary to

uniquely identify each claimant, but we are legally required to use these numbers in providing information to the United States government, including the Department of Health and Human Services (Medicare), to identify persons or health providers or related persons to whom we have made payment or are being requested to make payment.

NOTICE TO CALIFORNIA AND MASSACHUSETTS APPLICANTS AND INSURED:

The following are the U.S.-domiciled insurance company members of the MCC group of companies. You are provided with the following information pursuant to Secs. 702 and 703.1 of the California Insurance Code, as amended, and Massachusetts Division of Insurance Bulletin 2001-02.

Insurance Company Name (NAIC No.)	Domicile	Main Administrative Office and Mail Address	Jurisdictions in which Licensed to Transact Business	Jurisdictions in which Eligible as Surplus Lines Insurer
Paramount Insurance Company NAIC No.: 40177	NY	One Park Avenue, New York, New York 10016	NY, NJ, PA and MA	None
Public Service Insurance Company doing business in California as PSM Insurance Company NAIC No.: 15059	IL	One Park Avenue, New York, New York 10016	All 50 states and District of Columbia	None
Western Select Insurance Company NAIC No.: 10997	CA	One Park Avenue, New York, New York 10016	CA and NY	None

GOVERNING LAW

The contents of the Site and the legal terms used in it are governed in all respects by the laws of the State of New York, without reference to its choice of law rules. If an applicable law is in conflict with any part of the contents of the Site, said contents will be deemed modified to conform to the law. The other provisions will not be affected by any such modification.

Questions?

Telephone: 1-888-ONE-PARK extension 9269 or 212-591-9269 or email: privacy@mcarta.com

Effective Date: January 1, 2013