



CONSUMER PRIVACY NOTICE

Last Updated: September 2024

Obsidian Insurance Holdings, Inc. and its subsidiaries and affiliates, including Obsidian Specialty Insurance Company, Obsidian Insurance Company, and Obsidian Pacific Insurance Company, (hereinafter “Obsidian”, “we”, “us” and “our”) is committed to protecting the privacy of the personal information we collect or maintain. Personal Information means information that identifies you personally and is not otherwise available to the public.

This notice tells you about our Privacy Policy and how we protect the information that is disclosed to us.

Personal Information We Collect

The types of Personal Information we collect and may share vary depending on the products and services you have with us and on your interactions with us. This information may include:

- Information you provide to us in your application or claim;
- Information we collect about you and your property in connection with the initial underwriting or renewal of an insurance product or service;
- Insurance claim history, policy coverage(s), premiums, account balances and payment history;
- Medical history and records;
- Information we receive from third parties, such as agents, producers, service providers, inspection agencies, auditors;
- Information contained in consumer reports to the extent permitted by law, such as credit history, driving records, medical and employment history; or
- Details on your visits to our website and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources you access. If you contact us, we may keep a record of the correspondence or submission.

Personal Information does not include publicly available information from government records or de-identified or aggregated consumer information.

Why We Collect Your Personal Information

We may collect Personal Information for certain lawful purposes in some or all of the following ways:

- To service your transactions with us, such as your insurance application, your request for us to pay a claim, and your request for us to take action on your account;
- To maintain our accounts and records;
- To defend or make claims;
- To identify and prevent fraud;
- To comply with a legal or regulatory obligation; or
- To support our business functions.



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<p>How We Collect Your Personal Information</p>	<p>We collect most of this Personal Information directly from you – in person, by telephone, text, email and/or via our website. However, we may also collect information from other categories of sources, such as:</p> <ul style="list-style-type: none"> • Publicly accessible sources, such as property records; • Third parties, such as sanctions screening providers, credit reporting agencies, customer due diligence providers, internet service providers, social networks, data analytics providers and government entities; • Third parties with your consent, such as your bank; or • Cookies on our website.
<p>Sharing Your Personal Information</p>	<p>We use and share your Personal Information with affiliated and non-affiliated third parties for the purposes of underwriting insurance, administering your policy or claim and other purposes as permitted by law.</p> <p>We may disclose Personal Information about you and share such Personal Information only as allowed, such as disclosures:</p> <ul style="list-style-type: none"> • Between our insurance companies; • To service providers, such as program administrators, insurance agents, insurance brokers, claims adjusters, or reinsurers, that are providing services on our behalf and need to access your information to assist us in providing such services; • To an insurance regulatory authority in connection with the regulation of our business, or to a law enforcement agency, governmental authority or other authorized person or institution to protect our legal interests, detect or prevent insurance fraud or criminal activity; • In the event of any reorganization, merger, sale, joint venture, assignment, transfer, bankruptcy or other disposition of all or any portion of our business, assets or stock; or • In compliance with laws or at your consent or direction.
<p>Internal Access To Your Personal Information</p>	<p>We restrict access to your non-public Personal Information to those employees who need to know it in order to provide products and services to you, and we train our employees on how to handle and protect that information. Our employees have access to Personal Information in the course of doing their jobs, such as:</p> <ul style="list-style-type: none"> • Underwriting policies; • Paying claims; • Developing new products; or • Advising customers of our products and services.
<p>Safeguards To Protect Your Personal Information</p>	<p>We recognize the need to prevent unauthorized access to the Personal Information we collect, including information held in an electronic format on our computer systems. We maintain physical, electronic and procedural safeguards intended to protect the confidentiality and integrity of all non-public, Personal Information.</p>



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Reasons We Can Share Your Personal Information	Does Obsidian Share?	Can you limit sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	No	No
For joint marketing with other financial companies	No	No
For our affiliates’ everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness	No	No
For our affiliates to market to you	No	No
For nonaffiliates to market to you	No	No
Changes To This Policy	We will periodically review and revise our Privacy Policy and procedures to ensure that we remain compliant with all state and federal requirements. If any provision of our Privacy Policy is found to be noncompliant, then that provision will be modified to reflect the appropriate state or federal requirement. If any modifications are made, all remaining provisions of this Privacy Policy will remain in effect.	
Our Retention Policy	<p>We will keep your Personal Information while you have an account with us or while we are providing products and/or services to you. Thereafter, we will keep your Personal Information for as long as is necessary:</p> <ul style="list-style-type: none"> • To respond to any questions, complaints or claims made by you or on your behalf; • To show that we treated you fairly; or • To keep records as required by law. <p>Occasionally, legal obligations will require us to maintain certain records past their established retention periods until the legal hold has been removed.</p>	
Questions?	Call 1-800-684-5428 or write to privacy@obsidianspecialty.com	
<p>Your Rights If You Are A Resident Of Colorado, Connecticut, Utah or Virginia:</p> <ul style="list-style-type: none"> • You have a right to know what Personal Information of yours is collected and how it is processed. (Colorado, Connecticut and Utah residents) • You have a right know what Personal Information of yours is processed and how it is processed. (Virginia residents) • You have a right to know who Obsidian shares your Personal Information with. • You have a right to access your Personal Information maintained by Obsidian. • You have a right to correct inaccuracies in your Personal Information. • You have the right to request deletion of your Personal Information. • You have the right to opt-out of the sale of your Personal Information, the sharing of your Personal Information for targeted advertising, or the use of your Personal Information for profiling. • If you provide us with Personal Information that we use in automated decision-making, you have the right to obtain a copy of that Personal Information in a convenient and shareable format. <p>You may submit your request via email to privacy@obsidianspecialty.com or by calling us at 1-800-684-5428.</p>		



For Residents of California

CALIFORNIA CONSUMER PRIVACY ACT NOTICE

Last updated: September 2024

<p>This Privacy Policy for California residents supplements the information contained above and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”), and any terms defined in the CCPA have the same meaning when used in this notice.</p>		
<p>We collect Personal Information about California consumers for a variety of business reasons as indicated in the chart below. Please note the specific pieces of Personal Information we collect about you can vary depending on the nature of your interactions with us. Please refer to the section Why We Collect Your Personal Information above for categories of business or commercial purposes for the collection.</p> <p>The categories of Personal Information we may have collected from consumers within the last twelve (12) months and the categories of sources from which the Personal Information was collected include the following:</p>		
Category of Personal Information	Examples	Categories of Sources from which Personal Information is Collected
Identifiers	A real 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.	Directly from you; Other parties, such as agents, producers, consumer reporting agencies, service providers, inspection agencies, or publicly available information from social media or governmental agencies.
Personal Information categories listed in the California Consumer Records Statute (Cal. Civ. Code 1798.80(e))	A name, signature, social security number, physical characteristics or description, address, telephone 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, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	Directly from you; Other parties, such as agents, producers, consumer reporting agencies, service providers, inspection agencies, or publicly available information from social media or governmental agencies.
Protected classification characteristics under California or federal law	Examples include but are not limited to: age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition,	Directly from you; Other parties, such as agents, producers, consumer reporting agencies, service providers,



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	physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	inspection agencies, or publicly available information from social media or governmental agencies.
Commercial information	Examples include but are not limited to: your policy coverage, claims, premiums and payment history from your dealings with us, our affiliates, or others. Your financial history from other insurance companies, financial organizations or consumer reporting agencies.	Directly from you; Other parties, such as agents, producers, consumer reporting agencies, service providers, inspection agencies, or publicly available information from social media or governmental agencies.
Internet or other similar network activity	Examples include but are not limited to: browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Directly from you; Automatically from our websites through various technologies.
Audio, electronic, visual, thermal, olfactory, or similar information	Examples include but are not limited to: photographs or recordings of telephone calls.	Directly from you; Surveillance or recordings that we make, as authorized by law or with your permission.
Professional or employment-related information	Examples include but are not limited to: employer name, positions held, physical demands of positions held, and salary information.	Directly from you; Other parties, such as agents, producers, consumer reporting agencies, service providers, inspection agencies, or publicly available information from social media or governmental agencies.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Examples include but are not limited to: education records and transcripts.	Directly from you; Other parties, such as agents, producers, consumer reporting agencies, service providers, inspection agencies, or publicly available information from social media or governmental agencies.
Sensitive Personal Information	Examples include but are not limited to: social security numbers and other governmental identification numbers, financial account credentials, racial and ethnic origin, and health information.	Directly from you; Other parties, such as agents, producers, consumer reporting agencies, service providers, inspection agencies, or publicly



		available information from social media or governmental agencies
Information Excluded From CCPA's Scope	<p>Information excluded from the CCPA's scope includes, but is not limited to:</p> <ul style="list-style-type: none"> • Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 and the California Confidentiality of Medical Information Act or clinical trial data. • Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994. 	
Sale Of Personal Information	<p>We do not and will not sell your Personal Information, and we have not sold any Personal Information in the preceding twelve (12) months.</p>	
Who We Share Your Personal Information With	<p>Examples of third parties we may have shared your Personal Information with in the preceding twelve (12) months include, but are not limited to:</p> <ul style="list-style-type: none"> • Affiliate companies; • Companies that provide claims administration, underwriting, investigation or policyholder services for us or on our behalf; • Legal service providers; • Accounting service providers; or • Administrative service providers. 	
<p>Your Rights And Choices</p> <p>The CCPA provides California residents with specific rights regarding their Personal Information. The following rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply. This section describes your CCPA rights and explains how to exercise those rights.</p>		
Disclosure Of Personal Information We Collect About You	<p>You have the right to know, and request disclosure of:</p> <ul style="list-style-type: none"> • The categories of Personal Information we have collected about you, including Sensitive Personal Information; • The categories of sources from which the Personal Information is collected; • Our business or commercial purpose for collecting, selling, or sharing Personal Information; • The categories of third parties to whom we disclose Personal Information, if any; and • The specific pieces of Personal Information we have collected about you. <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> • Retain any Personal Information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Re-identify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information; or • Provide the Personal Information to you more than twice in a 12-month period. 	



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<p>Disclosure Of Personal Information Sold, Shared, Or Disclosed For A Business Purpose</p>	<p>We do not and will not sell your Personal Information. In connection with any Personal Information we may share, or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> • The categories of Personal Information about you that we shared and the categories of third parties to whom the Personal Information was shared; and • The categories of Personal Information that we disclosed about you for a business purpose and the categories of persons to whom the Personal Information was disclosed for a business purpose. <p>We do not and will not sell or share your Personal Information for the purpose of targeted behavioral advertising.</p> <p>Sharing or disclosure of personal information is only done for business reasons. Please refer to the section Why We Collect Your Personal Information above for categories of business or commercial purposes for the collection.</p> <p>Your Sensitive Personal Information is limited to only being shared for the purpose of providing you with the services you requested.</p>
<p>Access To Specific Information And Data Portability Rights</p>	<p>You have the right to request that we disclose certain information to you about our collection and use of your Personal Information in the preceding 12 months, including the categories of Personal Information collected about you, the sources from which your Personal Information was collected, and the business or commercial purposes for which your information is used, disclosed or sold, as well as the categories of third parties to whom your information is disclosed or sold.</p>
<p>Right To Request Deletion Of Your Personal Information</p>	<p>To the extent that your data is in-scope for CCPA's privacy rights, you have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Please be aware, however, that California law allows us to retain your Personal Information under certain conditions, even if you have asked us to delete it, such as when retaining your Personal Information is necessary for us to complete a transaction with you or provide you with a good or service you have requested.</p>
<p>Right To Correct Inaccurate Information</p>	<p>If we maintain inaccurate Personal Information about you, you have the right to request the correction of that Personal Information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate Personal Information.</p>
<p>Right To Limit Sensitive Personal Information</p>	<p>You have the right to limit the use and disclosure of your Sensitive Personal Information to the use which is necessary to:</p> <ul style="list-style-type: none"> • Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services; • To perform the following services: <ul style="list-style-type: none"> (1) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current

	<p>interaction with the business, provided that the consumer’s personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer’s experience outside the current interaction with the business;</p> <p>(3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business; and</p> <p>(4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business; and</p> <ul style="list-style-type: none"> • As authorized by further regulations. <p>You have a right to know if your Sensitive Personal Information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p> <p>Your Sensitive Personal Information is limited to only being used for the purpose of providing you with the services you requested.</p>
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Right To Non-Discrimination For Exercising Your Rights	<p>If you choose to exercise any of your rights, you have the right to not receive discriminatory treatment by us. This includes the right not to be retaliated against for the exercise of your CCPA rights.</p>
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How To Exercise Your Rights

If you would like to exercise any of your rights as described in this Privacy Policy, you may make a request described above using any of the following methods:

- Call us at 800-684-5428;
- Email us at privacy@obsidianspecialty.com;
- At our website www.obsidianspecialty.com; or
- Write to us at:

Obsidian Insurance Holdings, Inc.
 Privacy Office
 515 Centerpoint Drive, Suite 2207
 Middletown, CT 06457

Please note that we are only required to respond to your CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact us directly by email, phone or in writing, you will need to provide us with:

- Enough information to identify you [(e.g., your first name, last name, and policy number)];
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and



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- A description of what right you want to exercise and the information to which your request relates.
- Requests to know or requests to delete information for household members under the age of 13 require verifiable parental consent before we comply with your request.

We will confirm receipt of your request within 10 business days and will provide information about how we will process the request.

We will respond to requests to know and requests to delete within 45 calendar days. We may extend the time period by an additional 45 days, for a total of 90 calendar days, with prior notice and an explanation of why.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected Personal Information or is someone authorized to act on such person's behalf.

Any Personal Information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification. Any records of your request made pursuant to the CCPA and how we responded to the requests are retained for at least 24 months.