# **Podium Group | Website Privacy Policy**

Last Modified: October 2, 2025

### 1. Introduction

Podium Group (referred to as "we" or "us") respects your privacy and is committed to protecting it through this Privacy Policy (the "Policy"). This Policy outlines the types of information we may collect from you or that you may provide when using our website (the "Website") and how we use, share, and safeguard that information. It also describes certain rights you may have regarding your personal information. By accessing or using the Website, you acknowledge and agree to the terms of this Policy.

If you disagree with our policies and practices, please do not use the Website. We may update this Policy from time to time; continued use of the Website after we make changes constitutes your acceptance of those changes.

# 2. Scope of This Policy

This Policy applies to information we collect on or through:

- The Website.
- Electronic communications between you and the Website (such as email or text).
- Any third-party applications or services that interface with the Website and link to this Policy.

It does not apply to information collected by any third-party website or service that may be linked to or accessible from our Website, or information collected offline by us through other means.

### 3. Information We Collect & How We Collect It

#### 3.1. Information You Provide

You may provide information directly to us when using our Website, for example, by filling out forms, subscribing to newsletters, or contacting us. This information can include personal information such as your name, postal address, email address, telephone number, or other identifiers by which you may be contacted or identified. It also includes any other information you choose to submit through our forms or communications, such as the content of messages you send us. Information collected may include:

- Details you provide on contact forms or registration forms on the Website.
- Records of correspondence between you and us, such as emails or inquiries.

Providing your personal information is voluntary, but certain features of the Website may require it. We will use the information you provide only for the purposes described in this Policy or as otherwise disclosed at the time of collection.

# 3.2. Information Collected Automatically

We may collect certain information automatically through the use of cookies or other tracking technologies, including:

- IP address, browser type, device identifiers, and referring URLs.
- Website usage statistics.

### 4. How We Use Your Information

We use the information we collect about you or that you provide to us for a variety of business purposes. These include:

- To respond to inquiries or fulfill requests submitted through the Website.
- To operate, manage, and improve the Website and its features.
- To perform website analytics and measure traffic and performance.
- To send marketing communications and advertisements (where legally permitted and opted into).
- To detect, prevent, or address technical issues, fraud, or misuse.

# 5. Cookies and Tracking Technologies

We may use cookies, web beacons, and similar technologies to support functionality, collect analytics, and personalize user experience.

These may include first-party and third-party technologies from:

- Google Analytics
- Constant Contact
- RedCircle

Most browsers allow you to control or disable cookies. Refer to your browser settings for more information.

#### 6. Disclosure of Information

We do not sell your personal information to third parties. We may disclose personal information with certain categories of third parties for the business or operational purposes described below. Whenever we disclose personal information, we take reasonable steps to ensure that the receiving party is bound to handle it in accordance with this Policy and applicable law.

Categories of parties we may share information with include:

- To third-party service providers that support our Website.
- When necessary to protect our rights, users, clients, or business operations.
- In connection with a business transition: We may disclose or transfer personal information to a successor or acquiring entity in the event of a merger, acquisition, reorganization, or similar business transaction involving the transfer of all or substantially all our business assets, including as part of succession planning.
- As required by law, subpoena, or legal process.
- For any additional purpose that is disclosed at the time of collection or with your consent.

### 7. Third-Party Links and Embedded Content

Our website may contain links to or embedded content from third-party websites, tools, or services that are not owned or controlled by Podium Group These third parties may

independently collect data about you and operate under their privacy policies. We are not responsible for the privacy practices or content of any third-party services.

We encourage you to review the privacy policies of those websites or tools before interacting with them.

### 8. Data Security

We implement reasonable administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, use, or disclosure. However, no method of transmission over the internet or method of electronic storage is entirely secure. Therefore, we cannot guarantee the absolute security of your personal information.

If you believe your interaction with us is no longer secure, please contact us immediately using the contact information provided in Section 13.

### 9. Your Information and Your Choices

You have choices regarding the personal information you provide and how we communicate with you. Depending on how you interact with our Website, you may have the ability to:

- Access or correct personal information you have submitted.
- Opt-out of marketing emails or newsletters by following the unsubscribe instructions in those communications.
- Limit the use of cookies and other tracking technologies by adjusting your browser settings or managing preferences through any consent banner provided on the Website.
- Request deletion of certain information, subject to applicable legal and business requirements.

To exercise any of these rights, please contact us using the information provided in Section 13. Please note that we may need to retain certain information for recordkeeping or compliance purposes.

### 10. California Privacy Notice | Additional Disclosure for California Residents

If you are a California resident, we adopt this Section to comply with the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively "CCPA"). The Section applies only to California residents to the extent personal information is subject to the CCPA. The Section does not apply to information exempt from the requirements of the CCPA, such as information from government records or information made available to the general public, deidentified or aggregated information, or information governed by other laws such as the Gramm-Leach-Bliley Act (GLBA), California Financial Information Privacy Act (FIPA) or the Fair Credit Reporting Act (FCRA). This Section explains the information we collect, why we collect it, how we use and share it, and your rights concerning your personal information.

#### **Information We Collect**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information").

We have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
	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	
A. Identifiers.	number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	NO
C. Protected classification characteristics under California or federal law.	Age (forty (40) years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, 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).	YES
iavv.	Records of personal property, products or services	110
D. Commercial information.	purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or	
information.	exercise data.	NO
F. Internet or other similar network	Browsing history, search history, information on a consumer's interaction with a website, application,	VEC
activity.	or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification	NO

Category	Examples	Collected
Act (20 U.S.C.	codes, student financial information, or student	
Section 1232g, 34	disciplinary records.	
C.F.R. Part 99)).		
	Profile reflecting a person's preferences,	
K. Inferences drawn	characteristics, psychological trends,	
from other personal	predispositions, behavior, attitudes, intelligence,	
information.	abilities, and aptitudes.	YES
	Account log-in, financial account, debit card, or	
	credit card in combination with any required	
L. Sensitive Personal	security or access code, password, or credentials	
Information	allowing access to an account.	NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from applications submitted to us.
- From third parties as permitted by law, such as agents, brokers, and service providers.
- From your online interactions with us, we and analytics companies may automatically collect information about your use and access to our website.
- From publicly available sources.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- Facilitate, fulfill or meet the reason you provided the information, provide you services and products, take actions within the context of our ongoing business relationship with you, and perform our contract with you. For example, if you share your name and contact information to request a quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase insurance, we will use that information to issue your policy, to adjust your claim when you report a loss, and to process your payment. We may use that personal information to obtain an inspection of your property. We may also save your information to facilitate future transactions.
- Market, sell, and provide insurance.
- Day-to-day business and insurance operations.
- Communicate with you.
- Update or correct our records.
- Create, maintain, customize, and secure your account with us.
- Provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- Respond to law enforcement requests, comply with laws, regulations or other legal
  obligations, assist in an investigation, exercise and defend our rights and positions or the
  rights of third parties, enforce terms and conditions, or meet our obligations. We may also
  use your personal information to prevent suspected fraud, threats to our network or other
  illegal activities, prevent misuse or for any other reason permitted by law.
- Perform analytics and research to improve, develop, and protect our websites, services and products.
- As described to you when collecting your personal information or as otherwise allowed by law.

We do not market products or services to children under the age of sixteen and make no effort to collect personal information from children under the age of sixteen. We do not knowingly sell or share for cross-context behavioral advertising the personal information of children under the age of sixteen. Our websites are not intended for children.

### **Sharing of Personal Information**

We may share your personal information with the following categories of third parties:

- Service providers, such as financial institutions, agents, brokers, and companies involved
  in insurance and other business transactions, inspection companies to perform
  inspections of your property, independent adjusters, contractors, and vendors to assist in
  evaluating, processing, and managing your claims, and third parties who assist in
  determining an individual's eligibility for an insurance policy or provide support for our
  services and operations.
- Your representatives and other third parties designated by you.
- Another insured, claimant, or their representatives.
- Administrative service providers.
- Security service providers.
- Consumer reporting agencies and insurance support organizations.
- Law enforcement, regulators, and other parties for legal reasons, as required by law or subpoenas, or if we believe such actions are necessary to comply with the law and the requests of regulators, law enforcement or other public authorities, or to protect our or others safety, rights or property, or to investigate fraud or protect the security or integrity of our products and services, or other companies and parties as permitted by law.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category C: Protected classification characteristics under California or federal law.
- Category F: Internet or other similar network activity.
- Category K: Inferences drawn from other personal information.

We do not sell your personal information, including any sensitive personal information, for monetary compensation. If you visit <a href="https://example.com">thepodiumgroup.com</a> or our other websites, we may share (as defined under CCPA) some personal information (e.g. IP address, device ID) with service providers such as Google for cross-context behavioral advertising to display targeted advertisements to you.

### **Retention of Personal Information**

We retain personal information for as long as necessary or permitted for the purposes described in this Section or otherwise authorized by law, including satisfying any legal, accounting, regulatory, reporting or business requirements, establishing or defending legal claims, and satisfying record retention requirements.

# **Your Rights and Choices**

The CCPA provides you with specific rights regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights.

# Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

## Right to Delete

You have the right, subject to certain exceptions, to request that we delete your personal information that we collected from you and are maintaining. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction(s) for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Right to Correct

If you believe that personal information we maintain about you is inaccurate, you have the right, subject to certain restrictions, to request that we correct that information. We may request that you provide documentation to support your request to correct.

#### Right to Opt-Out

You have the right to opt out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising. However, we do not sell your personal information.

### Right to Limit

You have the right to limit sensitive personal information use and disclosure to specifically permitted purposes. However, we do not use or disclose sensitive personal information for purposes other than the specifically permitted purposes.

### Right to Non-Discrimination

You have the right not to receive discriminatory treatment by us for the exercise of your CCPA rights.

## Exercising Your CCPA Rights

To exercise these rights, please contact us using the information provided in Section 13.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are either the individual whose personal information we collected or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### Response Timing and Format

We will confirm receipt of a verifiable consumer request within ten (10) business days and endeavor to respond within forty-five (45) days of its receipt. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver a written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12)-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

# 11. Policy Towards Minors

Our Website and services are not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If you are under 13, please do not use or provide any information on this Website, make registrations, or otherwise submit personal data (including your name, address, phone number, or email).

If we discover that we have collected personal information from a child under 13 without verified parental consent, we will delete such information as required by law. If you believe we may have inadvertently collected data from a child under 13, please contact us using the information provided in Section 13.

If you are between 13 and 18 years of age, you may use this Website only with the involvement and permission of a parent or legal guardian. Certain jurisdictions impose additional rights and obligations regarding the collection and use of minors' personal information. We will comply with all applicable laws governing such practices.

Parents or guardians with questions about their children's data may contact us at any time.

### 12. Changes to the Privacy Policy

We reserve the right to update or modify this Website Privacy Policy at any time to reflect changes in our practices, legal requirements, or the functionality of our Website. When we make material changes to this Policy, we will revise the "Last Updated" date at the top of this page and may provide additional notice as required by applicable law.

We encourage you to review this page periodically for any updates. Your continued use of the Website following the posting of any changes indicates your acceptance of the updated Policy.

### 13. Contact Information

If you have any questions or concerns regarding this Website Privacy Policy, our data practices, or your personal information, you may contact us using the details below.

### **Podium Group**

Address: 3000 Town Center, Suite 3100, Southfield, MI 48075

Phone – Voice Only: (248) 678-9477 Email: <u>info@thepodiumgroup.com</u>

For privacy-related requests (including access, correction, or deletion under applicable laws), please indicate the nature of your request and provide sufficient information to verify your identity so that we may process your request appropriately.