



Last Updated: March 5, 2024

Privacy Policy

Welcome to the Rightway Life, Inc. website (the “Website”) at <https://rightwaylife.com> and thank you for visiting us. RightWay Life, Inc. is sometimes referred to herein as “RightWay”, “we”, “us”, or “our”. Rightway and its affiliates and subsidiaries recognize the importance of protecting the privacy and security of your personal information. Because we care about your privacy, we maintain appropriate physical, technical and procedural safeguards to protect personal information in compliance with applicable federal and state laws. We also monitor our computer networks and facilities, test our security controls, and regularly review our policies and practices.

This Privacy Policy sets forth your privacy rights and describes how we may collect, protect, use and share personal information. For purposes of this Privacy Policy, personal information means all nonpublic information related to an identified individual but does not include anonymized data or de-identified data that does not identify an individual. Some privacy and data protection laws and standards may refer to some of this nonpublic information as personally identifiable information, sensitive personal data, or protected health information.

INFORMATION WE COLLECT AND USE

We collect personal information in different ways, including through public records, but most of the information we gather is voluntarily provided to us by you when you use our Website or call to request a quote, complete an application for insurance, or inquire about insurance coverage or other types of products, programs or services. We may also gather information from (i) transactions or experiences with us (such as payments and customer service requests), (ii) use of our websites, blogs, and social media sites, (iii) interactions with our media advertisements and those of our marketing partners, (iv) telephone calls to us, and (v) service requests from our insurance carrier partners for whom we act as an agent.

HOW WE USE PERSONAL INFORMATION YOU PROVIDE TO US

We strive to provide you an exceptional user experience and personalized information to assist your insurance research and shopping needs. When you contact us or use our Website, we may collect certain nonpublic personal information provided voluntarily by you to: (i) process your applications; (ii) protect against fraud and unauthorized transactions; (iii) confirm your identity; (iv) offer you other insurance and protection products; (v) enhance your customer experience and improve our products and services; (vi) develop new products and services; and (vii) perform other activities as required or permitted by applicable laws. When we have the pleasure to speak with you on the phone, we record calls for quality, training and legal compliance purposes.

As a necessary part of the insurance quote process, we will collect certain personal information that you provide to us (such as your name, gender, date of birth, residence state, general health level, nicotine use, and your phone number(s) and email address) to enable us to provide you with your requested quote(s). When you begin the application process, you may be asked to provide additional personal data such as information about your home, medical and health related information, driving record, social security number, avocations, job/income information, financial information, biographical or demographic

information about you and your family, and any other additional information required by the insurance carrier(s). Some of this information may be collected by authorized third-party service providers through medical exams, blood and other clinical tests, and consumer reporting agencies. All such information will be protected and treated as personal information unless it has been converted to anonymized or de-identified data by removing personally identifiable information (so that the data is no longer personal information) in compliance with applicable laws and regulations.

We may also use your personal information for a variety of other business purposes such as developing and displaying content on our Website that is tailored to you, performing research and analysis about your use of our Website and its content, evaluating your potential interest in other products, programs, or services offered by us or our third-party providers, to provide you with educational and/or marketing related content about products, programs or services that we or our third-party providers offer, and for any other purpose disclosed and expressly consented to at the time you provide your personal information to us.

OTHER INFORMATION WE COLLECT AND USE

To optimize and personalize your experience with our Website and to provide you with the most relevant content, we and our third-party service providers may use a variety of common tracking technologies to automatically collect, use and store anonymous data (i.e.; data that does not reveal your specific identity) such as, browser and device information, demographic information, information collected through the use of cookies, pixel tags and other technologies, and aggregated information when you visit this Website (the “Other Information”).

COOKIES

Our Website may collect and use browser cookies, which are small pieces of text files sent from a website and stored on a user’s computer or device by the user’s web browser. Website cookies enhance your website and overall experience by facilitating website navigation and carrying information you provided us from one website visit to the next, so that you don’t have to re-enter information you’ve already provided us. Cookies further allow us to present you with advertisements or content that are more likely to appeal to you. We and third-party providers may also use cookies to track your responses to our advertisements in conjunction with other files to track your use of other websites. We and third-party providers may use cookies to collect and analyze data about how you and other visitors arrive at our Website and then how such visitors interact with our Website, including content or products they may view and the steps leading up to a completed or abandoned transaction or sale. This use of aggregated data allows us to test and adapt our Website to provide more relevant and useful content and to better serve our visitors’ preferences, interests and needs. The use of cookies referenced in this paragraph uses anonymous data and does not use a visitor’s personal information. These cookies log an anonymous code which is placed on a user’s electronic device on a temporary basis and follows such user while navigating the Website. We may aggregate and use this anonymous data for statistical analysis.

You can always turn off all cookies using your browser settings, however, if you do so, you may not be able to fully experience the interactive and robust features of this Website.

PIXEL TAGS OR OTHER SIMILAR TECHNOLOGIES

We may collect and use pixel tags (also referred to as clear GIFs, web beacons, or pixels) when you visit our Website, a website of one of our third-party service providers or other

third-party websites, or when you open email messages sent by us or on behalf of us. A pixel tag is a small, clear image that can be used for the purpose of tracking activity when HTML formatted emails are opened or accessed, for tracking activity on websites, and can often be used in combination with cookies.

We also use pixel tags and other similar anonymous data files on your device to perform various analytics such as measuring the performance and success of our marketing campaigns and your usage and the response rate of our Website services via reports and other tools. We may also use such data to conduct market research and associate you with other third-party websites that you visited which may serve advertisements on our behalf across the internet. The pixel tags or similar files on your device provided to us and third-party providers is anonymous and does not include personal information, but we may re-associate such anonymous data with personal information you provided after RightWay receives it.

We may use interest-based third-party advertising providers to target, distribute and report on advertisements disseminated across the internet based on our interactions with you and information we receive from other third-parties. These third-party providers may use pixel tags, cookies and other similar anonymous data files and combine it with other information they collect about your online use in order to recognize you across the different electronic devices you use. These third-parties may also match personal information we provide them with your IP address, which is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). This allows the third-party providers to serve advertisements to you across the web, based on your IP address. If you do not want to receive the benefits of targeted advertising, you may opt-out of some network advertising programs that use your information. Please note that even if you choose to remove your information, you will still see advertising when you are browsing online. However, the advertisements you see may be less relevant to you and your interests.

We and our third-party providers may automatically collect information from your device, including attributes such as your computer device type, operating system version, screen resolution, and internet browser. We use this information to ensure your Website experience with us is optimized regardless of whether you are using a computer, tablet, phone, or other electronic device.

We and our Third-Party providers may automatically collect information about your IP address. Your IP address is identified and automatically logged in our server log files whenever a visitor accesses this Website, along with the time of the visit and the page(s) that were visited. We use IP addresses for purposes such as calculating our Website usage levels, helping diagnose server problems, administering the Website, and geographic mapping.

Do Not Track (DNT) is a privacy preference that users can set in their web browsers, however, there is not yet a general understanding of how to interpret the DNT signal. At this time, our Website does not respond to Do Not Track browser settings or signals.

We reserve the right to use, disclose and retain Other Information from this Website, if it is not defined as personal information, for any use indefinitely, or as permitted by any related laws, rules, or regulations. In the event that any laws require Other Information to be handled as personal information or if we combine such Other Information and personal information, then we may use and disclose Other Information for all other purposes for which we use and disclose personal information in addition to the uses listed under the section entitled "Other Information We Collect and Use."

SECURITY AND STORAGE OF PERSONAL INFORMATION

The security of your personal information is very important to us, and we are committed to protecting the information we collect. We use appropriate technical, physical, and organizational security measures to protect your personal information against unauthorized access or use. From time to time, we review our security procedures to consider appropriate new technology and methods.

Unfortunately, no data transmission over the internet or data storage system can be guaranteed to be 100% secure. Therefore, while we strive to protect your personal information and take appropriate measures to do so, we cannot make any express or implied warranties that guarantee absolute security of personal information.

All of our on-site operational and data processing systems are contained in a secure environment and that environment is access-controlled. We may also store your data on off-site servers or in secure facilities with whom we have contractual agreements that obligate the use of all appropriate security measures to protect your personal information against unauthorized access or use.

We may retain your personal information for as long as needed, including if you do not buy anything or after you become a customer, and as required or allowed by law or as necessary to resolve disputes and enforce any of our agreements. Retention periods vary according to specific and applicable legal, auditing, regulatory and business needs.

If you have any questions about the security of your personal information, or if you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us in accordance with the section below entitled "Questions Regarding Our Privacy Policy."

HOW WE SHARE PERSONAL INFORMATION

When you provide your personal information to us, we may share this information with any of our third-party service providers in order to: (i) communicate about or market products, programs or services that we believe may be of interest to you, or (ii) for any other purpose disclosed as of the time you provided us your personal information with your express consent, and; (iii) as stated in this Privacy Policy. Sharing excludes text messaging originator opt-in data and consent; this information will not be shared with any third parties.

CONSENT

By submitting your personal information through our Website or to our associates, you expressly consent to the transfer of and the processing and usage of your personal information by RightWay and any other third-party service providers for marketing purposes or any other purposes as allowed by law or regulation or as stated in this Privacy Policy.

We contractually require any company we share your personal information with to exercise reasonable care to secure and protect your personal information against unauthorized access or use. Examples of the ways we may share your personal information with our third-party providers includes; (i) those authorized by us to use your personal information only as necessary to perform their functions and to the extent permitted by law such as; website hosting, IT services, data entry, analysis or fulfilment, infrastructure provision, email delivery services, providers making phone calls on our behalf, exam services, order fulfillment services, quoting services, customer service, contact information verification, marketing and advertising research and communication, auditing services, legal and public records research, fraud services, legal services, and other required services, (ii) to insurance carriers,

reinsurers and wholesalers, when you inquire about, apply for, and/or purchase products from us, (iii) to agents, brokers, producers, insurers, or their representatives, who may communicate about or market products, programs or services that they believe may be of interest to you, (iv) to any third-party in the event of a joint venture, sale, reorganization, assignment, transfer, merger, or any other disposition of the entire or any portion of our business or assets, (v) to any other nonaffiliated third-party who we believe may offer products, programs, or services that may be of interest to you, or for any other purposes in compliance with all federal and state laws, rules and regulations, and; (vi) if you have provided us a testimonial and provided express permission for us to share your comments. When initiating quotes or applications for insurance products, we may utilize techniques that may make it appear that you continue to remain on our Website when you are actually on a third-party provider website. During this experience, your personal information may be shared with third-party providers through a secure quote API to help generate the initial quote request. In the event you decide to proceed with an application with a carrier partner, your personal information may also be shared with the carrier partner through a secure hand-off API between our system and the carrier information system. You may be contacted by a RightWay agent, producer, representative, or authorized partner to help complete a needs assessment, quoting or application process successfully in the interest of providing the best service possible.

We reserve the right to disclose or share your personal information as permitted or required by law or regulation and when we believe that disclosure is necessary or advisable, for example to; (i) protect our rights, property, or safety of us, our third-party vendors or partners, or others, (ii) to comply with a valid and effective subpoena or order issued by a court of competent jurisdiction or other legal process or by law, rule or regulation, or (iii) for us to pursue available remedies or limit the damages we may sustain.

Please note that any personal information consisting of medical or health related information is shared with our third-party providers solely to perform business, professional or insurance functions on our behalf and as expressly authorized by you.

CHILDREN

This Website is not directed for its use by anyone under the age of thirteen (13) and we do not knowingly collect, use, share or disclose personal information entered from children under the age of thirteen (13) on this Website. If you are under the age of thirteen (13), please do not provide personal information on this Website. If we are made aware that we collected personal information entered from a child under thirteen (13) years old, we will take measures to delete this information as soon as possible.

THIRD-PARTY WEBSITES

Our Website may contain links to other third-party websites and we may include information and links to third-party websites in our emails. This Privacy Policy does not address and we are not responsible for the privacy policies or other practices of any third-party provider websites for any reason whatsoever, none of which are owned or controlled by us. If you submit personal information to any third-party provider websites that are linked to ours, your personal information is governed by their privacy policies and terms and conditions. We encourage you to carefully read the privacy policy of any website you visit.

YOUR PERSONAL INFORMATION CHOICES

You may opt-out of receiving future advertisement or promotional emails regarding our products or services by clicking on the "unsubscribe link" appearing in those emails or by sending an email unsubscribe request to: rightwaylife@swcares.com. We comply with all

requirements as promulgated by the CAN-SPAM Act. Please note that if you opt-out of emails with us, you may still receive emails from us that are administrative or transaction related.

You may also opt-out from us sharing your personal information with nonaffiliated third-parties. To make such a request, please send an email to: rightwaylife@swcares.com or write us at 100 Batson Court, Suite 104, New Lenox, IL 60451, United States. We will seek to comply with your opt-out request within a reasonable time period.

Please note that if you opt-out as described above, we are unable to remove your personal information from databases of nonaffiliated third-parties with whom we have already shared your personal information (i.e., to those which we have already provided your personal information as of the date on which we respond to your opt-out request). If you wish to opt-out of receiving marketing emails or further contact from such nonaffiliated third-parties, please use the available opt-out mechanisms provided within their emails or privacy policies, or contact them directly.

As a general recommendation, if you do not wish to be contacted by us or our third-party providers, or do not agree with all provisions of this Privacy Policy, please do not provide us your personal information.

YOUR CALIFORNIA PRIVACY RIGHTS

Privacy Notice for California Residents (effective January 1, 2020)

This Privacy Notice for California Residents supplements our general Privacy Policy and applies solely to those visitors and users that are residents of the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”), as amended, and other California Privacy laws. Any terms defined by the CCPA have the same meaning when used in this notice. The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Information We Collect and May Disclose

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 or household (“personal information”). Personal information does not include publicly available information, deidentified information, aggregate information, or any information protected by other privacy laws and otherwise excluded from the scope of the CCPA. We may disclose your personal information for a business purpose to third parties, such as our subsidiaries and affiliates, as well as to non-affiliated third-parties with whom we partner to offer products and services to you.

This table identifies the categories of personal information about consumers we have collected and may have disclosed for business purposes within the preceding 12 months:

| Category | Examples |
|--|--|
| A 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. |
| B Personal information categories listed in the California Customer Records statute (Cal. | 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, |

| | | |
|----------|---|--|
| | Civ. Code § 1798.80(e). (Related Information) | 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. |
| C | Protected classification characteristics under California or federal law. (Characteristics) | Age (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). |
| D | Commercial information. (Commercial Information) | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. |
| F | Internet or other similar network activity. (Internet Activity) | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. |
| H | Sensory data. (Sensory data) | Audio, electronic, visual, thermal, olfactory, or similar information. |
| K | Inferences drawn from other personal information. (Inferences) | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. |

Access To Specific Information and Data Portability Rights

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 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 or selling 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 (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - Sales of your information, identifying the personal information categories that each category of recipient purchased; and
 - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request 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. 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:

- i. Complete the transaction 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;
- ii. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- iii. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- iv. Comply with a legal obligation;
- v. Debug products to identify and repair errors that impair existing intended functionality;
- vi. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- vii. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; or
- viii. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

How To Exercise California Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by sending us an email to rightwaylife@swcares.com or write us at 100 Batson Court, Suite 104, New Lenox, IL 60451, United States.

Only you, or a person registered with the California Secretary of State that you authorize 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: (a) provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information or an authorized representative; and (b) describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to the request.

Our policy is to respond to a verifiable consumer request 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. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 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, specifically by electronic mail communication.

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.

In the time period from July 1, 2020 through March 5, 2024, we received zero (0) requests to know, zero (0) requests to delete, and zero (0) requests to opt-out. Accordingly, no requests were either denied or not complied with (in whole or part).

Right To Opt-Out

You have the right to direct us not to sell your personal information to third parties. Any personal information about you that we sell to a third party cannot be sold by that third party unless you have received explicit notice and are provided with an opportunity to opt-out of the sale of your personal information. You or your authorized representative may submit your request to opt out by sending us an email to rightwaylife@swcares.com or by writing to us at 100 Batson Court, Suite 104, New Lenox, IL 60451, United States.

Generally, we will not request additional information from you for purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information from you, which shall only be used for the purposes of verifying your identity and seeking to exercise your rights under the CCPA, and for security or fraud-prevention purposes. We will delete any new personal information collected for the purposes of verification as soon as practical after processing your request, except as required to comply with the CCPA. 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. We may require authentication that is reasonable in light of the nature of the personal information requested and will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Please note that we may continue to share your personal information with our affiliates and service providers for essential purposes described above and other such circumstances allowed under the CCPA. Opting out of the sale of personal information does not mean that you will stop seeing ads, including some interest-based ads. To learn more about interest-based advertising across sites and additional opt-out choices, please see our general Privacy Policy.

Use Of An Authorized Agent

If you use an authorized agent to submit a request to know or a request to delete, we may require that you provide the authorized agent written permission and require the authorized agent to verify its own identity with us and provide proof of their authority to act on your behalf (for example, an appropriate power of attorney to your authorized agent is an acceptable form of authorization). We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

When you submit a request to delete, or a request to know, we verify your request by taking the following steps:

- We may match the information you provided in your request with the personal information of the consumer already maintained by us; or
- We may use a third-party identity verification service that complies with the CCPA;

When verifying a request, we consider the following factors:

- The type, sensitivity, and value of the personal information collected and maintained about you;
- The risk of harm to you posed by any unauthorized access or deletion;
- The likelihood that fraudulent or malicious actors would seek the personal information;
- Whether the personal information to be provided by you to verify your identity is sufficiently robust to protect against fraudulent requests or being spoofed or fabricated;
- The manner in which we interact with you; and

- The technology available for verification.

Right To Non-Discrimination

We will not discriminate against you for exercising any of your rights under the CCPA. For example, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through the use of discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we reserve the right to charge you a different price or rate or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to you by your personal information.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify our Privacy Policy at any time, so we encourage you to periodically review our Privacy Policy. If we decide to make any material changes to our Privacy Policy, we will post notice on our homepage prior to that change becoming effective. Any changes made to our Privacy Policy will become effective as of the “Last Updated” date appearing above. By using this Website after any such changes, you accept and are agreeing to any such modified terms and conditions of our Privacy Policy.

QUESTIONS REGARDING OUR PRIVACY POLICY

RightWay is headquartered in New Lenox, Illinois USA and has appointed an internal data protection and compliance officer that you may contact if you have any questions or concerns regarding our Privacy Policy. RightWay’s data protection officer may be reached via U.S. mail or email at the following address:

ATTN: Data Protection Officer

RightWay Life, Inc.


100 Batson Court, Suite 104

New Lenox, IL 60451, United States

rightwaylife@swcares.com

Making life better for everyone

 100 Batson Court Suite 104, New Lenox, IL 60451

 info@swcares.com

 (800) 261-1660, (630) 472-1300

