



**Privacy Policy Notice
(as of January 1, 2021)
PURPOSE OF THIS NOTICE**

Title V of the Gramm-Leach-Bliley Act (GLBA) and the laws of the State of California generally prohibit us from sharing nonpublic personal information about you with a third party unless we provide you with this notice of our privacy policies and practices describing the type of information that we collect about you and the categories of persons or entities to whom that information may be disclosed. In compliance with the GLBA and California law, we are providing you with this document, which notifies you of the privacy policies and practices of SKA Financial Group, Inc. (SKA).

SKA provides this privacy policy (“policy”) to inform you of the 1) the type of information we collect; 2) your choices surrounding this information; and 3) how we collect, use, share, update and secure such information.

OUR PRIVACY POLICIES AND PRACTICES

1. Information we collect:

a. Categories of Information Collected and Sources from Which We Collect It. We collect nonpublic personal information about you from the following sources:

1) Information that you provide us on applications and other forms, such as your name, address, telephone number, email, vehicle numbers, driver’s license, driving records, social security number, date of birth, dependent information (name, social security number, date of birth), salary information, income and sources of income, Medicare id number, tax i.d. numbers, medical information, banking information and credit or debit card information (Personal information), and the Personal information of employees who work for you. We also obtain court information for purposes of benefit enrollment.

2) Information about your transactions with us from the insurance companies we contact to underwrite your insurance.

3) Information we receive from the Department of Motor Vehicles or other consumer reporting agencies, including driving record, convictions about you and your employees.

4) Information contained in medical records or from medical professionals that is related to insurance claims.

5) We may also acquire information about you from a Company that we acquire through a sale or acquisition.

Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional information will be collected about you.



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b. Persons From Whom Information is Collected.

We may collect nonpublic personal information from individuals other than those proposed for coverage.

2. Information we may disclose to third parties:

We do not disclose Personal Information about you to third parties whose only use of the information is to market a product or service. We also do not sell your information to third parties for money (see below for details). However, in the course of our general business practices, we may disclose the information that we collect (as described above) about you or others without your permission to the following types of institutions for the reasons described below:

- a) To a third party for the sole purpose of joint marketing on our behalf.
- b) To an insurance institution or agent in order to detect or prevent criminal activity, fraud, or misrepresentation in connection with an insurance transaction.
- c) To an insurance institution or agent for either this agency or the entity to whom we disclose the information to perform a function in connection with an insurance transaction involving you.
- d) To a medical care institution or medical professional in order to verify coverage or benefits, inform you of a medical issue of which you may not be aware, or conduct an audit that would enable us to verify treatment.
- e) To the California Department of Insurance or other insurance regulatory authority, law enforcement, or other governmental authority in order to protect our interest in preventing or prosecuting fraud, or if we believe that you have conducted illegal activities.
- f) To a group policyholder for the purpose of reporting claims experience or conducting an audit of our operations or services.

3. Your right to access and amend your “Personal Information”:

Your right to access the Personal Information that we record about you. Your right includes the right to know the source of the information and the identity of the persons, institutions or types of institutions to whom we have disclosed such information within 2 years prior to your request. Your right includes the right to view such information and copy it in person, or request that a copy of it be sent to you by mail (for which we may charge you a reasonable fee to cover our costs). Your right also includes the right to request corrections, amendments or deletions of any information that is in our possession. The procedures that you must follow to request access to or an amendment of your information are as follows:

4. California Consumer Privacy Act. (CCPA)

California residents have certain additional rights regarding our collection, use, disclosure, or sale of your Personal Information:



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1) You may request a copy of the following: (1) the categories of Personal Information we collected about you in (at least) the last 12 months; (2) the categories of sources from which the Personal Information is collected; (3) the business or commercial purpose for collecting or selling (if applicable) the Personal Information; (4) the categories of third parties with whom we shared Personal Information in (at least) the last 12 months (if applicable), and the categories of Personal Information shared; and (5) the specific pieces of your Personal Information that we have collected, used, disclosed, or sold.

2) You may request that we (and our service providers) delete your Personal Information. Note that deletion requests are subject to certain limitations, for example, we may retain Personal Information as permitted by law, such as for tax or other record-keeping purposes, to maintain an active account, to process transactions and facilitate customer requests, and for certain other internal business purposes described in our Privacy Policy.

To request a copy of Personal Information we have collected about you, or to request that your information be deleted, please submit your request here: [Privacy Request](#) or by contacting us at the address and email address below. Please note that you will be taken to our external request submissions portal by clicking “Privacy Request” and providing your name, email, and state of residence. You may authorize another person (your “agent”) to submit a request on your behalf in the same way. Shortly after you (or your agent) submit a request, we will check our records for matching information and contact you (via email at the email address provided during the submission of your request) with instructions on how to verify the request before we fulfill it. We will aim to complete your requests as soon as reasonably practicable and consistent with any applicable laws. Please note that by submitting a deletion request, you are not requesting to close a customer account (if you have one). You can close an account by calling us at (559) 322-2230 and can opt out of email or marketing lists as provided in our Privacy Policy.

To obtain access to your information: You should submit a request in writing to SKA Financial Group, Inc., 9477 N. Fort Washington Rd. Suite # 102 Fresno, CA 93730, or email us at privacy@SKAfg.com. The request should include your name, address, social security number, telephone number, and the recorded information to which you would like access. The request should state whether you would like access in person or a copy of the information sent to you by mail. Upon receipt of your request, we will contact you within 30 business days to arrange access in person or provide you with copies that you have requested.

To correct, amend, or delete any of your information: You should submit a request in writing to SKA Financial Group, Inc., 9477 N. Fort Washington Rd. Suite # 102 Fresno, CA 93730, or email us at privacy@SKAfg.com. The request should include your name, address, social security number, telephone number, email address, the specific information in dispute, and the identity of the document or record that contains the disputed information. Upon receipt of your request, we will contact you within 30 business days to notify you either that we have made the correction, amendment, or deletion, or that we refuse to do so and the reasons for the refusal, which you will have the opportunity to challenge.



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5. Our practices regarding information confidentiality and security:

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide products or services to you. We use a variety of security measures to help protect the personal information we maintain. While no company can guarantee the security of your information, we use physical, administrative, and technical controls consistent with insurance industry practices to mitigate such risks and comply with state and federal law.

6. Expectation of privacy:

If you close your account(s) or become an inactive customer, we will continue to adhere to this privacy policy.

7. Our policy regarding dispute resolution:

Any controversy or claim arising out of or relating to our privacy policy, or the breach thereof, shall be settled by arbitration in accordance with the rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction thereof.

8. Reservation of the right to disclose information in unforeseen circumstances:

In connection with the potential sale or transfer of its interests, SKA, and its affiliates, reserve the right to sell or transfer your information (including but not limited to your name, address, age, sex, zip code, state and country of residency, and other information that you provide through other communications) to a third party entity that (1) concentrates its business in a similar practice, product or service; (2) agrees to be SKA's successor in interest with regard to the maintenance and protection of the information collected; and (3) agrees to the obligations of this privacy statement.

9. Non-discrimination policy:

SKA may not, and will not, discriminate against any customer for exercising their privacy rights, including those provided by the CCPA. Please note that we may otherwise continue to share your Personal Information with our affiliates and service providers, and as otherwise directed by you, for the purposes described in our Privacy Policy.

10. California privacy rights – direct marketing:

It is not our intention to provide the Personal Information of our clients or their employees to third parties for direct marketing. However, we do wish to advise you that California Civil Code § 1798.83 provides you with the right to submit a request to us at our designated address and receive the following information:

1. The categories of Personal Information SKA has disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year;

2. The names and addresses of third parties that received such information; and

3. If the nature of a third party's business cannot be reasonably determined from the third party's name, examples of the products or services marketed.

You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. Our designated email address for such a request is privacy@SKAfg.com.

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