

# Postlethwaite & Netterville Claims Administration Privacy Policy

#### Last Updated: April 21, 2023

Postlethwaite & Netterville (A Professional Accounting Corporation) and its affiliated or subsidiary entities (collectively, "P&N," "we," "our," or "us") provides this Privacy Policy governing claims administration sites (the "Claims Administration Policy") to describe the information we collect, how we use it, and when and with whom we share it. This Claims Administration Policy applies only to information that we collect and use about you when you access or use our claims administration sites that link to or otherwise present this Claims Administration Policy to you (collectively, the "Claims Administration Services").

By accessing or using the Claims Administration Services, you agree to this Claims Administration Policy. If you do not agree to this Claims Administration Policy, please do not access or use the Claims Administration Services.

This Claims Administration Policy does not apply to information we process from our other websites or from our clients and prospective clients of other services we provide. To view the privacy practices specific to those services, please review our P&N Privacy Policy.

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# 1. The Scope of this Policy and Your Choices

P&N provides Claims Administration Services in connection with our position as a data processor or service provider on behalf of courts and/or other clients (collectively, "Claims Administration Clients") that retain P&N to administer court-approved settlements and related matters.

Claims Administration Clients that may be supervising the matter determine what information to collect and how P&N should process such information for any claims administration project. P&N does not control how Claims Administration Clients use the information P&N processes on their behalf, and you should consult with the applicable Claims Administration Client to understand how they use the information they receive from or through P&N.

Because we process data collected through the Claims Administration Services on behalf of our Claims Administration Clients, to the extent you seek to access, delete, or correct the



information you submitted, we may be required to convey your request to the applicable Claims Administration Client and otherwise comply with the Claims Administration Client's instructions on how to handle your request.

## 2. The Information We Collect

We obtain information about you through the means discussed below when we provide the Claims Administration Services. Please note that in our capacity as settlement administrator, Claims Administration Clients may direct us to collect certain information. We need this information to process your proof of claim or otherwise provide the Claims Administration Services. If you do not provide us with such information, or if you ask us to delete that information, you may no longer be able to access or use certain or all aspects of the Claims Administration Services which may, without limitation, impact your ability to submit a proof of claim. The information collected depends in part on which of the Claims Administration Services you use.

# a. Information you provide directly to us

We may collect information that you provide directly to us:

- When you use our Claims Administration Services, e.g. when you file a proof of claim;
- When you fill out forms;
- When you request information;
- When you transmit information to us;
- When you request support or assistance; and
- When you otherwise communicate with us through the Claims Administration Services.

The information you provide directly to us may concern you or others and may include, but is not limited to:

- Identifiers and Contact Information. We may collect identifiers and other contact information from you, such as your name, email address, telephone number, and other government issued identifiers such as a social security number.
- Third-Party Account Information. We may collect account information about thirdparty accounts relevant to the particular settlement fund or claims administration services. For example, if eligibility for proceeds from a claims administration proceeding require that you used an account with a third party, we may require information about that account to verify your eligibility.
- Demographics. You may also provide us with demographic information when using the Claims Administration Services, such as age and gender.
- Financial Information. We may collect financial information, such as account details.
- Other Information. You may also provide us with other information relevant to the Claims Administration Services, such as information within a proof of claim, date of birth, health-related information, and other information required by Claims Administration Clients to facilitate the administration of settlement funds.

You are not required to provide us with such information, but certain features of the Claims Administration Services may not be accessible or available, absent the provision of the requested information.



#### b. Information from Claims Administration Clients

As directed or provided by Claims Administration Clients, we may collect information about you or others from or through non-affiliated third parties, including our Claims Administration Clients. We may combine information that we collect from you through the Claims Administration Services with information that we obtain from such third parties.

## c. Information we collect automatically

Device/Usage Information. We and our third-party service providers, which include ad networks and analytics companies such as Google Analytics, may use cookies, web beacons, and other tracking technologies to collect information about the computers or devices (including mobile devices) you use to access the Claims Administration Services. As described further below, we may collect and analyze information including but not limited to (a) browser type; (b) ISP or operating system; (c) domain name; (d) access time; (e) referring or exit pages; (f) page views; (g) IP address; (h) unique device identifiers (e.g. IDFA or Android ID); and (i) the type of device that you use. We may also track when and how frequently you access or use the Claims Administration Services, including how you engage with or navigate our website or mobile application. We use this information (including the information collected by our third-party service providers) for analytics (including to determine which portions of the Claims Administration Services are used most frequently), to assist in notifying you of pending proof of claims, and as otherwise described in this Claims Administration Fund Policy.

Cookies and Other Electronic Technologies. We and our third-party service providers may use cookies, clear GIFs, pixel tags, and other technologies that help us better understand user behavior, personalize preferences, perform research and analytics, and improve the Claims Administration Services. These technologies, for example, may allow us to tailor the Claims Administration Services to your needs, track the pages you visit, help us manage content, and compile statistics about usage of our Claims Administration Services. We or our third-party service providers also may use certain of these technologies in emails to our customers to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but your browser may allow you to modify your browser settings to decline cookies if you prefer. If you disable cookies, you may be prevented from taking full advantage of the Claims Administration Services, because the Claims Administration Services may not function properly. As we adopt additional technologies, we may also gather additional information through other methods.

<u>Location Information.</u> When you use the Claims Administration Services, we may collect general location information (such as general location inferred from an IP address).

#### 3. How We Use Your Information

We use your information to provide Claims Administration Services, including administer settlement funds, on behalf of Claims Administration Clients, including courts. Uses may include:



- To provide the Claims Administration Services, including to process, administer, and audit your claim;
- To respond to questions or inquiries, including to provide support and assistance to you and/or attorneys, court personnel, or others affiliated with a particular claims administration proceeding or settlement fund;
- To communicate with you about your claims or inquiries;
- To analyze and improve the Claims Administration Services or other services we may provide;
- To verify your identity;
- To comply with our legal obligations or as permitted by law;
- To protect the safety and/or integrity of our users, employees, third parties, members of the public, and/or the Claims Administration Services;
- To prevent fraud and enforce our legal terms; and
- To administer and troubleshoot the Claims Administration Services.

We may aggregate and/or de-identify information collected through the Claims Administration Services. We may use or disclose de-identified or aggregated data for any purpose.

#### 4. When We Share Your Information

Subject to our obligations to Claims Administration Clients, we may share or disclose information in the following ways:

**Affiliates.** We may share your information with any of our affiliates as necessary to provide the Claims Administration Services to Claims Administration Clients.

As Directed by Claims Administration Clients. Because we provide the Claims Administration Services on behalf of Claims Administration Clients, we may disclose your information to nonaffiliated third parties at the direction of our Claims Administration Clients.

**Vendors That Provide Services to Us.** We provide access to or share your information with select third parties who perform services on our behalf. They provide a variety of services to us, including data storage, analytics, communications services, printing and mailing services, location and identification services, payment processing, tax information reporting, support services, data storage, security, fraud prevention, and legal services.

**Protection of P&N and Others.** We may share or disclose certain information if we believe in good faith that doing so is necessary or appropriate to (i) protect or defend the rights, safety, or property of P&N or third parties, including to defend or enforce our Claims Administration Services Policy or any other contractual arrangement or (ii) respond to your requests for user support; and/or (iii) protect the rights, property or personal safety of P&N, its agents and affiliates, its employees, users and/or the public.

**Legal Requirements:** We may share or disclose certain information if we believe in good faith that doing so is necessary or appropriate to comply with any law enforcement, legal, or regulatory process, such as to respond to a warrant, subpoena, court order, or other applicable laws and regulations.



**Business Transfer:** We may share or disclose certain information, in connection with or during negotiations of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

**Aggregate/Anonymous Information:** From time to time, we may share aggregate/anonymous information about use of the Claims Administration Services, such as by creating reports on usage trends. The sharing of such data is unrestricted.

# 5. Online Analytics and Tailored Advertising a. Analytics

We may use third-party web analytics services on the Claims Administration Services, such as those of Google Analytics. These service providers use the sort of technology described in the "Information we collect automatically" section above to help us analyze how users use the Claims Administration Services, including by noting the third-party website from which you arrive. The information collected by the technology will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Claims Administration Services. We also use Google Analytics for certain purposes related to advertising, as described in the following section. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-Out Browser Add-on.

## b. Tailored Advertising

Third parties may also place cookies or other tracking technologies on your computer, mobile phone, or other device to collect information about your use of the Claims Administration Services in order to (a) inform, optimize, and serve marketing content based on past visits to our websites and other sites and (b) report how our marketing content impressions, other uses of marketing services, and interactions with these marketing impressions and marketing services are related to visits to our websites. We also allow other third parties (e.g., ad networks and ad servers such as Google Analytics) to serve tailored marketing to you and to access their own cookies or other tracking technologies on your computer, mobile phone, or other device you use to access the Claims Administration Services. We neither have access to, nor does this Claims Administration Services Policy govern, the use of cookies or other tracking technologies that may be placed on your computer, mobile phone, or other device you use to access the Claims Administration Services by non-affiliated, third-party ad technologies, ad servers, ad networks or any other non-affiliated third parties. Those parties that use these technologies may offer you a way to opt out of targeted advertising as described below. You may receive tailored advertising on your computer through a web browser. Cookies may be associated with de-identified data linked to or derived from data you voluntarily have submitted to us (e.g., your email address) that we may share with a service provider in hashed, non-human-readable form.

If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored marketing, you may visit the Network Advertising Initiative's ("NAI") Consumer Opt-Out Link and/or the Digital Advertising Alliance's ("DAA") Consumer Opt-Out Link to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, you can visit the Google Ads Settings page. Please note that to the extent advertising technology is integrated into the Claims Administration Services, you may still receive advertising content even if you



opt out of tailored advertising. In that case, the advertising content will just not be tailored to your interests. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms. If your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different computer or change web browsers, your NAI or DAA opt-out may no longer be effective. Additional information is available on NAI's and DAA's websites, accessible by the above links.

#### 6. Children's Information

The Claims Administration Services are not designed for minors under 18. Only persons 18 years of age or older may use the Claims Administration Services. If we discover that an individual under 18 has provided us with personal information, we will close the account and delete the personal information to the extent required by the Children's Online Privacy Protection Act. We may, where permitted by law, retain certain information internally for purposes described in this Claims Administration Services Policy.

# 7. Third-Party Sites and Services

The Claims Administration Services may contain links to third-party websites or services. We are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Claims Administration Policy. We urge you to read the privacy and security policies of these third parties.

## 8. Consent to Transfer of Information

Computer systems maintain your information may be based in various countries, including in the United States. Your personal information may thus be processed in locations where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By using the Claims Administration Services, you agree to this Claims Administration Services Policy and you consent to the transfer of all such information to our servers in the United States and elsewhere, which may not offer a level of protection equivalent to that required in the European Union or certain other countries, and to the processing of that information as described in this Claims Administration Services Policy.

# 9. Updates to Our Claims Administration Fund Privacy Policy

We may change this Claims Administration Services Policy to reflect changes in the law, obligations to Claims Administration Clients, our information practices or the features of the Claims Administration Services. At the top of our Claims Administration Services Policy, we will indicate the date of the most recent update. If we make a material change to the Claims Administration Services Policy, you will be provided with appropriate notice in accordance with legal requirements. By continuing to use the Claims Administration Services, you are confirming that you have read and understood the latest version of this Claims Administration Services Policy.

### 10. Contact Us

If you have questions about this Claims Administration Services Policy, please contact us at PNWebRequestapncpa.com.