

## ONLINE PRIVACY POLICY SUPPLEMENT FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act (CPRA) and its implementing regulations, provides California residents with specific rights regarding personal information. The following supplement is provided in addition to the rights in our Online Privacy Policy, addresses these rights and applies solely to site visitors, members and others who reside in the State of California (“consumer(s)”, “you” or “your”).

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"). The CCPA does not consider the following to be personal information:

- Publicly available information.
- Deidentified or aggregated consumer information.
- Other types of information specifically excluded by the CCPA, as amended by the CPRA and its implementing regulations. For example, personal information governed by the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act.

### Categories of personal information we may have collected

Category	Examples	Retention – nonworkforce	Retention – workforce
Identifiers	Real name, previous names, home address, billing address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Personal data in this category is retained for the time length of the certificate or application, plus 10 years.	Personal data in this category is retained as long as necessary to comply with applicable federal and state laws, in compliance with industry best practices, and as necessary to accomplish the purposes of the data collection, including providing services as detailed in this Online Privacy Policy Supplement.

Additional personal information	Signature, physical characteristics or description, telephone number, driver's license or state identification card number, certificate number, education, employment, employment history, bank account number, or any other financial information, or medical and health information.	(Same as above.)	(Same as above.)
Protected classifications	Age (40 years or older), race, color, national origin, citizenship, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.	(Same as above.)	(Same as above.)
Commercial information	Records of personal property, products or services purchased, obtained, or considered, credit history, motor vehicle reports, driving history or other purchasing or consuming histories or tendencies.	(Same as above.)	(Same as above.)

<p>Biometric information</p>	<p>Physiological, biological or behavioral characteristics, including an individual's DNA. Other identifiers or with other identifying information, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data.</p>	<p>(Same as above.)</p>	<p>(Same as above.)</p>
<p>Internet or other electronic network activity information</p>	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>(Same as above.)</p>	<p>(Same as above.)</p>
<p>Geolocation data</p>	<p>Physical location</p>	<p>(Same as above.)</p>	<p>(Same as above.)</p>
<p>Sensory data</p>	<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>(Same as above.)</p>	<p>(Same as above.)</p>
<p>Professional or employment-related information</p>	<p>Applications, resumes, background check, current or past job history or performance evaluations.</p>	<p>(Same as above.)</p>	<p>(Same as above.)</p>

<p>Nonpublic education information (as defined in the Family Educational Rights and Privacy Act, 20 U.S.C. section 1232g, 34 C.F.R. Part 99)</p>	<p>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 codes, student financial information, or student disciplinary records.</p>	<p>(Same as above.)</p>	<p>(Same as above.)</p>
<p>Inferences drawn from any of the information</p>	<p>Profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>(Same as above.)</p>	<p>(Same as above.)</p>

### Regarding sensitive\* personal information

Sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is treated as personal information – described in the chart shown here – for all other purposes under the CCPA, as amended by CPRA and its implementing regulations. Modern Woodmen does not infer characteristics about you using sensitive personal information in a manner that is inconsistent with California Law.

*\*Examples of sensitive personal information: Social Security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; the contents of a consumer's mail, email and text messages (unless Modern Woodmen is the intended recipient of the communication); genetic data; biometric information; health information; or information regarding sex life or sexual orientation.*

### Categories of sources used to collect personal information

Modern Woodmen obtains the categories of personal information listed above from these categories of sources:

- Directly from you. For example, from applications and other forms completed by you, including online forms you fill out on our corporate or member website or mobile application, or from your transactions with us, our affiliates (i.e., companies related to us by common ownership or control) and nonaffiliates.
- Indirectly from you or your device. For example, from observing your actions on our corporate or member website or mobile application.
- From third-party service providers and contractors. For example, from any of the entities listed in your signed authorization, once submitted, to gather the data needed to process your application or otherwise service your products with us, from credit reporting agencies and other companies we work with, and from companies who give us marketing information.

**Modern Woodmen does not sell or share<sup>1</sup> personal information. Modern Woodmen of America also does not infer characteristics about you using sensitive personal information in a manner that is inconsistent with California law.**

### **Business purpose for collecting personal information**

We ask for only the personal information necessary to deliver products and services and/or to consider opportunities for employment, volunteer positions or field positions. For each category listed above, we may use or disclose the personal information we collect for one or more of the following purposes.

- Fulfill or meet the reason you provided the information, such as responding to an inquiry about our products or services.
- Process applications for products or services you have applied for or requested.
- Process your application and maintain information related to your employment, volunteer leadership or field position.
- Provide the product(s) or service(s) you have applied for or requested.
- Process your requests, purchases, transactions and payments, for security purposes, and to prevent transactional fraud.
- Offer you additional products and services.
- Evaluate and pay claims for member benefits.
- Administer and pay workforce benefits.
- Provide support and manage your certificate(s) or account(s).
- Administer and offer fraternal member benefits available to you as a member of Modern Woodmen of America.
- Facilitate participation in Chapter activities or other opportunities available to you as a member of Modern Woodmen of America.
- Communicate with consumers about Modern Woodmen of America and its products, services and benefits.
- Test, analyze, develop and improve our products and services.
- Maintain the safety, security and integrity of our website, products and services, databases and other technology assets.
- Respond to law enforcement requests and as required by or to demonstrate compliance with applicable law, court order, or state or federal regulations.

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<sup>1</sup>“Share,” “Shared,” or “Sharing” as used in this Online Privacy Policy Supplement shall mean sharing personal information with a third party for cross-context behavioral advertising. Modern Woodmen of America does **not** share your information.

## Categories of information disclosed with third parties

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

- Identifiers.
- Additional personal information.
- Protected classifications.
- Commercial information.
- Biometric information.
- Internet or other electronic network activity information.
- Geolocation data.
- Sensory data.
- Professional or employment-related information.
- Nonpublic education information (as defined in the Family Educational Rights and Privacy Act, 20 U.S.C. section 1232g, 34 C.F.R. Part 99).
- Inferences drawn from any of the information.

## Categories of third parties to whom this information is disclosed

We may disclose your personal information for business purposes.

<b>Personal information category</b>	<b>Categories of third parties to whom personal information may be disclosed for business purposes</b>
Identifiers	<ul style="list-style-type: none"><li>• Affiliates of Modern Woodmen.</li><li>• Third-party service providers and contractors.</li><li>• Government agencies and self-regulatory agencies.</li><li>• Government entities</li></ul>
Additional personal information	(Same as above.)
Protected classifications	(Same as above.)

Commercial information	(Same as above.)
Biometric information	(Same as above.)
Internet or other electronic network activity information	(Same as above.)
Geolocation data	(Same as above.)
Sensory data	(Same as above.)
Professional or employment-related information	(Same as above.)
Nonpublic education information (as defined in the Family Educational Rights and Privacy Act, 20 U.S.C. section 1232g, 34 C.F.R. Part 99)	(Same as above.)
Inferences drawn from any of the information	(Same as above.)

## Your rights under the California Consumer Privacy Act of 2018

The California Consumer Privacy Act of 2018 (CCPA) provides California residents with specific rights regarding their personal information. These include:

- Right to Notice
- Right to Know
- Right to Correct
- Right to Deletion

- Right to Opt-Out
- Right to Limit
- Right to Equal Service

### **Consumer's right to notice**

At or before the time personal information is collected, consumers have the right to be informed about the categories of information that may be collected and the business purpose for which it will be used.

### **Consumer's right to know**

A consumer has the right to request a business that collects a consumer's personal information disclose to that consumer the following:

- The categories of personal information it has collected about that consumer.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting, sharing, or selling personal information.
- The categories of third parties with whom the business discloses personal information.
- The specific pieces of personal information it has collected about that consumer.

### **Request submission**

A California consumer may submit a request for information by calling Modern Woodmen's Service Center at 1-800-447-9811 or 309-558-3077 or by completing the request form at [modernwoodmen.org/your-information](https://modernwoodmen.org/your-information). You may only make a verifiable consumer request for information twice within a 12-month period.

### **Verifiable consumer request**

Before Modern Woodmen responds to a request from a California consumer, we will verify the identity of that consumer. This will be done using information from the California consumer and comparing that to any personal information we previously collected about that consumer. For Modern Woodmen members, information you may be asked to provide includes name, address, phone number, date of birth, last four digits of Social Security number, and Modern Woodmen certificate number. For California consumers who are not members, you will be asked to provide your name and contact information, which may include your address, phone number and email address. We may ask for additional pieces of information, depending on the circumstances, to ensure proper verification.

The verifiable consumer request must:

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

### **Consumer's right to correct**

The consumer has the right to correct inaccurate personal information that a business maintains about the consumer.



## **Request correction**

A California consumer may submit a request for correction by calling Modern Woodmen's Service Center at 1-800-447-9811 or 309-558-3077 or by completing the request form at [modernwoodmen.org/your-information](https://modernwoodmen.org/your-information).

## **Consumer's right to request deletion of personal information**

A California consumer has the right to request we delete personal information that we collected and retained, subject to certain exceptions. Once a verifiable consumer request is received and confirmed, we will delete (and direct our service providers and contractors to delete) personal information from our records, unless an exception applies.

We may deny a deletion request if retaining the information is necessary for us or our service provider(s) to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et seq.*).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- 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.

## **Request deletion**

To exercise the deletion rights described above, please submit a verifiable consumer request to us by either calling Modern Woodmen's Service Center at 1-800-447-9811 or 309-558-3077 or by completing the request form at [modernwoodmen.org/your-information](https://modernwoodmen.org/your-information). Please reference the section on verifiable consumer request above regarding how Modern Woodmen will validate your request.

## **Consumer's right to opt-out**

A California consumer has the right to know if their personal information is sold or shared. If the personal information is sold, the consumer has the right to opt-out of the sale of that information.

**Modern Woodmen does not share or sell personal information it collects.**

**Modern Woodmen does not share your personal information with a third party for cross-context behavioral advertising.**

Modern Woodmen does not have actual knowledge that it sells the personal information of consumers under 16 years of age.

## **Consumer's right to limit**

If sensitive personal information is collected for the purposes of inferring characteristics about a consumer, the consumer has the right to request the business limit use and disclosure of that sensitive personal information to what is necessary to perform services or provide the goods reasonably expected by an average consumer who requests such goods or services.

**Modern Woodmen does not infer characteristics about you using sensitive personal information in a manner that is inconsistent with California Law.**

## **Consumer's right to equal service**

Modern Woodmen will not discriminate against a California consumer if he/she exercises any of the rights in this Supplement. We will not:

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

## **Requests from an authorized agent**

Only a consumer or someone legally authorized to act on a consumer's behalf may make a verifiable consumer request. A consumer may designate an authorized agent to submit a request to know, request to correct, or a request to delete. In order to make a request on a consumer's behalf, an authorized agent must provide Modern Woodmen with either a signed permission from the consumer, or a power of attorney pursuant to California Probate Code 4121 to 4130. Modern Woodmen may require the consumer to verify their own identity directly with Modern Woodmen, or directly confirm with Modern Woodmen that the consumer provided the authorized agent permission to submit the request.

## **Changes to our Online Privacy Policy Supplement for California Residents**

This supplement may be updated from time to time for any reason. Any material changes made to the Online Privacy Policy Supplement for California Residents will be posted in this area on this website and will result in the supplement's effective date being updated. We suggest that you consult this Online Privacy Policy Supplement regularly for any changes. Continued use of the sites after we have notified you any such changes shall constitute your consent to such changes.

## **Additional Information**

You can find electronic copies of our Privacy Statement and our Online Privacy Policy at [www.modernwoodmen.org](http://www.modernwoodmen.org).

If you need to access this Online Privacy Policy in an alternative format due to having a disability, please contact us at [ComplianceDepartment@modern-woodmen.org](mailto:ComplianceDepartment@modern-woodmen.org) or call us at 309-558-3077 or 1-800-447-9811.

If you have any further questions or wish to request additional information as provided in this Supplement, please [contact us](#) here, or please write or call us at:

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309-558-3077 or 1-800-447-9811

Effective 01/01/2020.

Last updated 01/01/2023.