

## **Shepherd Labs, Inc. Privacy Policy**

**Effective Date: June 24, 2021**

Shepherd Labs, Inc. (“Company,” “we,” “our,” or “us”) is committed to respecting and protecting the privacy of our users. This Privacy Policy (“Policy”), describes how we collect, use, and disclose information that we obtain about visitors to our website, <http://www.withshepherd.com> (the “Site”), and the services available through our Site (the “Services”).

Your use of our Services, and any dispute over privacy, is subject to this Policy and our Terms of Use, including its applicable limitations on damages and the resolution of disputes.

Our Services are used by different users, including insurance brokers (“Brokers”) and individuals or businesses that seek insurance or are covered by insurance (“Insureds”). We explain below our information collection practices applicable to Brokers and Insureds.

### **Brokers**

This section of our Policy addresses our information practices applicable to Brokers.

#### **a. The Information We Collect About You**

We collect information about you directly from you, from third parties, and automatically through your use of our Services.

***Information We Collect Directly from You.*** The information we collect from you depends on how you use our Services. Information we collect may include:

- When you create an account to use the Services, we may collect information such as your full name, e-mail address, phone number, and organization or company name.
- If you choose to provide it to us, we may also provide information such as your company address and photo.
- When you use the Services, we may collect information from you about your customers, including names, e-mail addresses, phone numbers, and company names.
- We may also collect information that you provide on behalf of, or in collaboration with, your customers for insurance application purposes or as otherwise needed for you to use the Services.
- We collect the information you provide us when you fill out a survey, questionnaire, or other type of form through the Services.
- If you contact us, we collect records and copies of your correspondence, including e-mail addresses, transcripts of customer service chat sessions, and other contact information.

- When you subscribe to receive updates from us about new features available on our Site or through the Services, we collect contact information from you, such as your name, mailing address, e-mail address, or telephone number.
- While you are navigating the Site or using the Services, we may also collect your search queries or information about your viewing history.
- We collect any information you choose to e-mail or communicate to us while using the Services.

***Information We Collect Automatically.*** We automatically collect information about your use of our Services through cookies, web beacons, and other technologies. To the extent permitted by applicable law, we combine this information with other information we collect about you, including your personal information. Please see the section **Our Use of Cookies and Other Tracking Mechanisms** below for more information.

When you use our Services, we may collect your browser type and operating system, web pages you view, links you click, and your IP address. We may also collect information about the length of time you spent visiting our Site and/or using our Services, and the referring URL, or the web pages that led you to our Site.

***Information We Collect from Other Entities.*** When you use the Services, we may collect information, including personal information, about you from third-party sources, such as service providers or third-party platforms that are integrated with our Site. For example, we may offer third-party integrations that you can choose to log into and access through the Services, and from which you can allow us to collect information in order to use the Services. Information we collect from third parties may be combined with other information we have collected about you in order to complete requests you have made or facilitate transactions you have initiated via the Services, or for other purposes.

#### **b. How We Use Your Information**

We use your information, including your personal information, for the following purposes:

- To present our Site and its contents to you, or to provide you with access to the Services.
- To provide you with information, products, or services that you request from us.
- To notify you about changes to our Services, or any products or services we offer or provide through the Services.
- To communicate with you about your use of our Services, to respond to inquiries and complaints, and for other customer service purposes.
- To tailor the content, information, and recommendations that we may send or display to you, to offer location customization, personalized help and instructions, to provide you with benchmarking reports, and to otherwise personalize your experiences while using the Services.
- To contact you via e-mail or text messages regarding services you have requested from us.

- For marketing purposes, including to provide you with special offers, promotions, news, and newsletters; to contact you about products we think may interest you; to administer contests, promotions, and other offers; and for other marketing, advertising, and promotional purposes.
- For internal product testing and improvement purposes.
- To better understand how users access and use our Services, both on an aggregated and individualized basis, and for research and analytics purposes.
- To administer surveys and questionnaires, such as for market research or user satisfaction purposes.
- To comply with legal obligations, as part of our general business operations, and for other business administration purposes, such as maintaining customer records, monitoring your compliance with any of your agreements with us, collecting debts owed to us, and safeguarding our business interests.
- Where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, and in situations involving potential threats to the safety of any person or violations of our Terms of Use or this Privacy Policy.
- To fulfill any other purpose for which you provide the information.
- For any other purpose with your consent.

### **c. How We Share Your Information**

We may share your information, including personal information, as follows:

***Service Providers.*** We may disclose the information we collect from you to service providers, contractors or agents who perform functions on our behalf. For example, we share your information with service providers who host our Site, analyze aggregate information about our customers, assist us in detecting and deterring fraud, security incidents, or other unlawful activity, and for other business purposes as described in the **How We Use Your Information** section.

***Subsidiaries and Affiliates.*** We may disclose the information we collect from you to any current or future parent company, affiliate, subsidiary, or division.

***Analytics Providers.*** As set forth above, we share information with analytics providers and advertisers to assist us in implementing and evaluating relevant advertising. Often, the information that we share is collected from you through cookies and other tracking technologies on our Site. See the section **Our Use of Cookies and Other Tracking Mechanisms** for more information.

We also disclose information in the following circumstances:

***Business Transfers.*** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and third-party advisors, including attorneys and consultants.

***In Response to Legal Process.*** We disclose your information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.

***To Protect Us and Others.*** We disclose your information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we are involved.

***Aggregate and De-Identified Information.*** We may also use and share aggregate or de-identified information about users with third parties for marketing, advertising, research, or other purposes.

## **Insureds**

This section of our Policy addresses our information practices applicable to Insureds.

### **a. The Information We Collect About You**

***Information We Collect Directly from You.*** The information we collect from you depends on how you use our Services. Information we collect may include:

- When you create an account to use the Services, we may collect information such as your full name, e-mail address, phone number, and organization or company name.
- If you choose to provide it to us, we may also provide information such as your company address and photo.
- We also collect information from you as needed to provide you with the Services, which may include employer identification numbers, company type, fleet history, prospective payrolls, historical and active project information, experience modification rates, company contact information, insurance program and claim details, employee contact information, and company vehicle and driver schedules and information (collectively, “Insured-Specific Information”).
- We collect the information you provide us when you fill out a survey, questionnaire, or other type of form through the Services.
- If you contact us, we collect records and copies of your correspondence, including e-mail addresses, transcripts of customer service chat sessions, and other contact information.
- When you subscribe to receive updates from us about new features available on our Site or through the Services, we collect contact information from you, such as your name, mailing address, e-mail address, or telephone number.
- While you are navigating the Site or using the Services, we may also collect your search queries or information about your viewing history.
- We collect any information you choose to e-mail or communicate to us while using the Services.

***Information We Collect Automatically.*** We automatically collect information about your use of our Services through cookies, web beacons, and other technologies. To the extent permitted by

applicable law, we combine this information with other information we collect about you, including your personal information. Please see the section **Our Use of Cookies and Other Tracking Mechanisms** below for more information.

When you use our Services, we may collect your browser type and operating system, web pages you view, links you click, and your IP address. We may also collect information about the length of time you spent visiting our Site and/or using our Services, and the referring URL, or the web pages that led you to our Site.

***Information We Collect from Other Entities.*** When you use the Services, we may collect information, including personal information, about you from third-party sources, such as our customers, including Brokers, service providers or third-party platforms that are integrated with our Site. For example, when a Broker invites you to use the Services, we may collect personal information about you from the Broker, including Insured-Specific Information, which the Broker provides to us on your behalf. Additionally, we may offer third-party integrations that you can choose to log into and access through the Services, and from which you can allow us to collect information in order to use the Services. Information we collect from third parties may be combined with other information we have collected about you in order to complete requests you have made or facilitate transactions you have initiated via the Services, or for other purposes.

#### **b. How We Use Your Information**

We use your information, including your personal information, for the following purposes:

- To present our Site and its contents to you, or to provide you with access to the Services.
- To provide you with information, products, or services that you request from us.
- To notify you about changes to our Services, or any products or services we offer or provide through the Services.
- To communicate with you about your use of our Services, to respond to inquiries and complaints, and for other customer service purposes.
- To tailor the content, information, and recommendations that we may send or display to you, to offer location customization, personalized help and instructions, to provide you with benchmarking reports, and to otherwise personalize your experiences while using the Services.
- To contact you via e-mail or text messages regarding services you have requested from us.
- For marketing purposes, including to provide you with special offers, promotions, news, and newsletters; to contact you about products we think may interest you; to administer contests, promotions, and other offers; and for other marketing, advertising, and promotional purposes.
- For internal product testing and improvement purposes.
- To better understand how users access and use our Services, both on an aggregated and individualized basis, and for research and analytics purposes.
- To administer surveys and questionnaires, such as for market research or user satisfaction purposes.

- To comply with legal obligations, as part of our general business operations, and for other business administration purposes, such as maintaining customer records, monitoring your compliance with any of your agreements with us, collecting debts owed to us, and safeguarding our business interests.
- Where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, and in situations involving potential threats to the safety of any person or violations of our Terms of Use or this Privacy Policy.
- To fulfill any other purpose for which you provide the information.
- For any other purpose with your consent.

### **c. How We Share Your Information**

We may share your information, including personal information, as follows:

***Our Customers.*** We may disclose your information to our customers, including Brokers, for purposes of providing the Services.

***Service Providers.*** We may disclose the information we collect from you to service providers, contractors or agents who perform functions on our behalf. For example, we share your information with service providers who host our Site, analyze aggregate information about our customers, assist us in detecting and deterring fraud, security incidents, or other unlawful activity, and for other business purposes as described in the **How We Use Your Information** section.

***Subsidiaries and Affiliates.*** We may disclose the information we collect from you to any current or future parent company, affiliate, subsidiary, or division.

***Analytics Providers.*** As set forth above, we share information with analytics providers to assist us in implementing and evaluating relevant advertising. Often, the information that we share is collected from you through cookies and other tracking technologies on our Site. See the section **Our Use of Cookies and Other Tracking Mechanisms** for more information.

We also disclose information in the following circumstances:

***Business Transfers.*** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and third-party advisors, including attorneys and consultants.

***In Response to Legal Process.*** We disclose your information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.

***To Protect Us and Others.*** We disclose your information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations

involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we are involved.

***Aggregate and De-Identified Information.*** We may also use and share aggregate or de-identified information about users with third parties for marketing, advertising, research, or other purposes.

### **Our Use of Cookies and Other Tracking Mechanisms**

We and our third-party service providers use cookies and other tracking mechanisms to track information about your use of our Site or Services. We may combine this information with other personal information we collect from you (and our third-party service providers may do so on our behalf).

***Cookies.*** Cookies are alphanumeric identifiers that we transfer to your device's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site and Services, while others are used to enable a faster log-in process or to allow us to track your activities at our Site and Service. There are two types of cookies: session and persistent cookies.

- ***Session Cookies.*** Session cookies exist only during an online session. They disappear from your device when you close your browser or turn off your device. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Services. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Site.
- ***Persistent Cookies.*** Persistent cookies remain on your device after you have closed your browser or turned off your device. We use persistent cookies to track aggregate and statistical information about user activity.

***Disabling Cookies.*** Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Site and Services who disable cookies will be able to browse certain areas of the Site, but some features may not function.

***Clear GIFs, Pixel Tags and Other Technologies.*** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web and app pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Services to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our third-party service providers may also use clear GIFs in HTML e-mails to our customers, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.

***Third Party Analytics.*** We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Site. We use

these tools to help us improve the performance of our Site and user experiences. These entities may use cookies and other tracking technologies, such as web beacons or local storage objects (LSOs), to perform their services. To learn more about Google’s privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

***Do-Not-Track Signals.*** Please note that our Site does not recognize or respond to any signal which your browser might transmit through the so-called “Do Not Track” feature your browser might have. If you wish to disable cookies on our Site, you should not rely on any “Do Not Track” feature your browser might have. For more information about do-not-track signals, please click [here](#).

### **Third-Party Links**

Our Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

### **Security of Your Personal Information**

We have implemented reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust, unique password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

### **Access Your Personal Information**

You may modify personal information that you have submitted through use of the Services by logging into your account and navigating to the “Account Settings” tab. To submit a request to delete personal information you have submitted through use of the Services, you may contact us via the information included in the **Contact Us** section below.

### **Your Choices Regarding Our Use of Your Personal Information**

We may send periodic promotional e-mails to you. You may opt-out of promotional e-mails by following the opt-out instructions contained in the e-mail. If you opt-out of receiving promotional e-mails, we may still send you e-mails about your account or any services you have requested or received from us.

### **Notice Concerning Children**



Our Services are not designed for children under thirteen (13). If we discover that a child under thirteen (13) has provided us with personal information, we will delete such information from our systems.

### **Changes to this Policy**

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Site.

### **Contact Us**

If you have questions about the privacy aspects of our Site or Services or would like to make a complaint, please contact us at:

Shepherd Labs, Inc.  
415 Mission Street, 37th Floor  
San Francisco, CA, 94105  
Phone: 617-780-1127  
E-mail: [support@withshepherd.com](mailto:support@withshepherd.com)