

Online Privacy Policy

Effective Date: August 1, 2022

Introduction

This Online Privacy Policy describes how Ethos Technologies Inc. and its affiliates (collectively, “Ethos”, “we”, “us” or “our”) handle personal information that we collect through our digital properties that link to this Online Privacy Policy, including our websites (“Sites”) and any mobile application (“Mobile App”) (collectively, the “Service”), as well as through social media, our marketing activities, and other activities described here.

At the time we collect personal information, Ethos may provide additional or supplemental privacy policies to individuals for specific products or services that we offer. For example, if you sign up for, apply for, or previously had one of our Insurance Products (as defined below), the [Ethos Consumer Privacy Notice](#) applies to you. For individuals in this context, the [Ethos Consumer Privacy Notice](#) provides more information about how we collect, use and share your personal information and outlines certain choices you may have. If there were a conflict between this Online Privacy Policy and any privacy notice, disclosure, policy or terms relating to any Insurance Product, the privacy notice, disclosure, policies or terms relating to the Insurance Product govern. As another example in which an additional or supplemental privacy policy may apply to you, if you are a life insurance agent who wants to partner with Ethos, our [Agent Privacy Notice](#) applies to the information that we collect about you.

You can view our most recent Privacy Policy [here](#).

Glossary

We want you to understand the following defined terms that we use throughout this Online Privacy Policy. When we use the term:

- “Estate Planning Document” or “Estate Planning Documents”, we mean an estate planning document offered through Tomorrow Ideas, Inc. (an Ethos affiliate).
- “Including” or “includes”, we mean “including but not limited to” or “includes but is not limited to.”
- “Insurance Product” or “Insurance Products”, we mean the life insurance policy(ies) offered through Ethos including any policyholder account, as well as

financial educational information and materials. For clarity, the Insurance Products do not include any [Estate Planning Documents](#).

Personal information: How we collect and generate it, and why

Depending on, as applicable, the Insurance Product, Estate Planning Document and the relationship we have with you, we may collect or generate personal information—about you, or a third party acting for you. For example:

- Before you begin an application, sign up for an account, obtain a policy or otherwise obtain an Insurance Product and/or Estate Planning Document, we may collect data from affiliates; as well as third parties such as data analytics providers, consumer reporting agencies, Ethos customers, service providers (including insurance agents) and others.
- While applying, signing up for an account, or obtaining a policy through the Service or otherwise obtain an Insurance Product and/or Estate Planning Document and over the course of your relationship with us, we collect information about you from the following sources:
 - You
 - Affiliates
 - Third parties, such as private sources (insurance agents, consumer reporting agencies, healthcare providers, health information exchanges, and other data providers), semi-private sources such as social media platforms, and public sources (like government agencies)
 - Service providers (such as identity verification and fraud prevention vendors)
 - Independent business partners (such as insurance agents, brokerages, carriers, and/or marketing firms)
 - Through the tools described in the [“Cookies and Other Tracking Technologies”](#) section below
 - Internally (as we may generate new information about you.)
- When you communicate and otherwise interact with us through the Service and/or over the phone, social media and/or other platforms, we may monitor and record the communications’ content and collect information about your use and interactions with the Service (such as through the mechanisms or similar mechanisms described in the [“Cookies and Other Tracking Technologies”](#) section below). By communicating or otherwise interacting with us, you acknowledge your communication(s) or interaction(s) may be overhead, monitored, and/or recorded without further notice or warning by us or third parties.
- When you interact with the Service and in connection with our marketing and other communications, we may collect personal information using cookies, web

beacons, page tags, pixels and/or other similar tools (for more information see the [“Cookies and Other Tracking Technologies”](#) section below) that we and our service providers and other third parties have set.

- When you interact with the Service via a social media platform, we may collect a copy of the posts and other information, such as account identification information or username.

Below, we provide examples of the types of personal information we and others may collect:

- Contact data. This includes first and last name; alias; salutation; previous name; email address; billing address; mailing address; account username; social media profile; and phone number.
- Device and online identifiers and related data. This includes your device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), internet protocol (“IP”) address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), email interaction information (whether you open and/or forward our emails); and general location such as city, state or geographic area.
- Background data. This includes familial (including household) information; place of birth; information about your personal and professional associations, criminal history, and motor vehicle records.
- Health data. This includes your general health status; medical history; familial medical history; diagnosis, treatment, prescription and other medical information; information regarding mental illness, alcohol use, drug use and/or nicotine use; height; weight; health insurance information; and other health data.
- Financial data. This includes credit report information (also known as consumer report or background check data); credit based insurance scores; bank account routing number; bank account number; transaction information (including any accounts that you link to an Insurance Product and/or Estate Planning Document); financial account information (including statements and checks); payment card numbers; account information about externally linked accounts; account login credentials you use to access our Insurance Products and/or Estate Planning Documents; household income data; tax documents; insurance policy number(s); existing or past life insurance coverage; your authority over financial accounts (including trusted contact(s)/beneficial interest in and other information about entities with whom you are associated); public company affiliations; source of wealth information; net worth; and other financial information.

- Profile data. This includes the username and password that you may set to establish an online account on the Service; redemption code(s); biographical details (such as date of birth); photograph or picture; interests; preferences; information about your participation in our contests, promotions, and/or surveys; and any other information that you add to your account profile.
- Government-issued identification data. This includes Social Security number; tax-identification number; passport number; state or local identification number (for example, driver's license or state identification number); alien registration number; and copies (including images) of relevant government-issued identifications.
- Protected classification characteristics data. This includes age; national origin; citizenship; nationality; marital status; sex; and veteran or military status.
- Communications data. This includes information based on our exchanges with you, including when you contact us through the Service, social media, or otherwise.
- Transactional data. This includes information relating to or needed to complete your orders/purchases on or through the Service, including policy numbers and transaction history.
- Marketing data. This includes your preferences for receiving our marketing communications and details about your engagement with them.
- Relationship data. This includes information regarding beneficiaries, familial (including household) and other relationships to third parties whose personal information you may provide to us.
- Promotion data. This includes information you share when you enter a competition, promotion or complete a survey. Please note that if you participate in a sweepstakes, contest or giveaway through the Service, we may ask you for your contact data to notify you if you win or not, to verify your identity, determine your eligibility, and/or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstakes and contest that you enter.
- Internet, application, and network activity data. This includes data related to your activity (e.g., when and how you use the Service and interact with our communications including emails) such as email history, browsing history (including pages or screens you viewed, how long you spent on a page or screen), search history (including the website you visited before browsing to the Service) and clickstream history, online website tracking information, email access information, other data related to online activity, and URL referral header information. We may collect this type of information automatically via cookies,

browser web storage, web beacons and similar technologies (see our Cookies and Other Tracking Technologies Notice for more information).

- Location data. This includes your zip code and other information about your location and your mobile device including a unique identifier for your device; in addition, in some instances, location information can be estimated from your IP address or through your wireless signal.
- Sensory data. This includes audio and visual data such as a recording of your voice when you communicate on the phone or video with us.
- Professional or employment-related data. This includes occupation; title; employer; employment history; income; and industry affiliations.
- Education data. This includes your degrees and level of education.
- Inferential data. This includes a profile reflecting your preferences; characteristics; predispositions; behavior; attitudes; creditworthiness; and insurability profile.
- User-generated content data. This includes photos; images; comments; questions; messages, works of authorship; and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that individuals can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- Other data not specifically listed here, which we will use as described in this Online Privacy Policy or as otherwise disclosed at the time of collection.

While you do not have to supply any of the personal information that we may request, if you do not provide such information, we may not be able to provide the Insurance Products and/or Estate Planning Documents to you, or you may not be able to engage with our Service. We may offer features that help individuals invite their family, friends or other contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

Cookies and Other Tracking Technologies

Some of our data collection is facilitated by cookies and other tracking technologies. For more information, see our [Cookies and Other Tracking Technologies Notice](#) which is incorporated into this Online Privacy Policy. In connection with the Service, we may make a record of your preferences for each browser on each device in respect of the use of these technologies.

How We Use Your Personal Information

We use your personal information for administering, operating and managing your relationship with us, the Insurance Products, and/or Estate Planning Documents. We use your personal information for operating, evaluating and improving our business, the Service, our Insurance Products and/or our Estate Planning Documents (including assessing and managing risk, fulfilling legal requirements, developing new products and services, improving and personalizing existing Insurance Products and/or Estate Planning Documents and services, and performing accounting, auditing and other internal functions). Without limitation to how we may use your personal information as otherwise described in this Online Privacy Notice or at the time of collection, for illustrative purposes only, we outline below how we may use your personal information.

Purpose

Service, Insurance Product and Estate Planning Document delivery, which may include using your personal information to:

- provide and operate the Service, Insurance Products and Estate Planning Documents as well as operate our business
- establish and maintain your user profile on the Service and/or in relation to the Insurance Products and/or Estate Planning Documents
- assist in the underwriting of your life insurance application such as making eligibility determinations, risk ratings, policy issuance and post-issuance services
- administer claims and coverage
- authenticate your identity (such as sending you security codes via email, text and/or SMS)
- mitigate fraud and enhance the security of the Service, our Insurance Products and/or Estate Planning Documents as well as our services
- remember your devices and preferences
- understand your needs and interests in relation to the Service, the Insurance Products and/or Estate Planning Documents and our business
- personalize your experience with the Service, Insurance Products and/or Estate Planning Documents and our communications
- provide support for the Service, and respond to your requests, questions and feedback
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages
- present your profile and post your user-generated content (except for messages) in line with your configuration of relevant settings on the Service

- administer events, promotions and contests
- facilitate your invitations to family, friends and other contacts who you want to invite to join the Service

Categories of personal information we may use

- Contact data
- Device and online identifiers and related data
- Background data
- Health data
- Financial data
- Profile data
- Government-issued identification data
- Protected classification characteristics data
- Communications data
- Transactional data
- Biometric data
- Marketing data
- Relationship data
- Promotion data
- Internet, application and network activity data
- Location data
- Sensory data
- Professional or employment-related data
- Education data
- Inferential data
- User-generated content data
- Other data

For purposes of this Online Privacy Policy, we refer to the above categories as “Any and all data types relevant in the circumstances”

Purpose

Marketing, which may include using your personal information to:

- send you direct-marketing communications (you may opt-out of our marketing communications as described in the Opt-out of marketing section below)
- personalize our marketing communications according to your needs and interests
- develop and implement marketing and acquisition models
- identify marketing recipients

- monitor your interaction with our communications (such as whether you opened them) – including to measure the success of our communication campaigns and your engagement with those communications, so that we can manage our content more effectively and make it more relevant to you
- facilitate your invitations to family, friends and other contacts who you want to invite to join the Service
- disclose to third parties for their purposes of offering Ethos and/or non-Ethos products and services
- present third-party products and services we think may be of interest

Categories of personal information we may use

- Contact data
- Device and online identifiers and related data
- Background data
- Financial data
- Communications data
- Transactional data
- Marketing data
- Promotion data
- Internet, application and network activity data
- Location data
- Inferential data

Purpose

Interest-based advertising, which may include using your personal information to:

- share aggregated, de-identified or otherwise anonymized data with third parties, including to promote our business through interest-based advertising on third party channels
- share information about our users with our third-party advertising partners to facilitate interest-based advertising to those or similar users on other online platforms
- allow our third-party advertising partners to collect information about your interaction with the Service, our communications and other online services over time and use that information to serve online ads that they think will interest you

Categories of personal information we may use

- Device and online identifiers and related data

- Internet, application and network activity data
- Location data
- Inferential data

Purpose

Research and development, which may include using your personal information to:

- improve the Service, Insurance Products and/or Estate Planning Documents
- improve our business

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

Analytics, which may include using your personal information to:

- analyze your use of the Service, Insurance Products and/or Estate Planning Documents
- analyze your responses to our communications
- improve the Service, Insurance Products, and/or Estate Planning Documents
- improve the rest of our business
- help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails.

For more information, see our [Cookies and Other Tracking Technologies Notice](#).

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

Compliance with legal obligations and co-operation with others, which may include using your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities
- comply with contractual obligations, industry standards and our policies

- audit our internal processes for compliance with legal and contractual requirements or our internal policies
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft
- cooperate with law enforcement authorities in investigating and prosecuting users who violate any terms and conditions governing use of the Service, or engage in behavior that is illegal or harmful to other users, including suspected fraud, or situations involving potential threats to the physical safety of any person

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

Protection and enforcement of rights, which may include using your personal information to:

- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims)
- enforce the terms and conditions that govern the Service
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

Data sharing in the context of corporate events, we may share certain personal information in the context of actual or prospective corporate events.

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

Data aggregation, de-identification and/or anonymization, we may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into

aggregated, de-identified and/or anonymized data by removing information that makes the data identifiable to you.

We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

Further uses in which case we will ask for your consent to use of your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

With your consent, we may use your consent to collect and/or share your personal information.

Categories of personal information we may use

- Any and all data types relevant in the circumstances

Purpose

Retention, we generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

Categories of personal information we may use

- Any and all data types relevant in the circumstances

How We Share Your Personal Information

We may share your personal information with the following parties and as otherwise described in this Online Privacy Policy or at the time of collection.

- Ethos affiliates. We may share personal information with members of the Ethos family of companies (for example, our corporate parent, subsidiaries, and affiliates).
- Service providers. We may share personal information with non-affiliated entities or individuals that provide services on our behalf (such as those providing services related to data collection, data analytics, identity verification, risk management, security, advertising, marketing, communications, data hosting, information technology, customer support, and consumer research).
- Payment processors. Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Stripe. Stripe may use your payment data in accordance with its privacy policy, <https://stripe.com/privacy>. You may also sign up to be billed by your mobile communications provider, who may use your payment data in accordance with their privacy policies.
- Insurance producers or referral partners. We may share personal information with entities or individuals that facilitate your purchase of our Insurance Products or direct you to our Service. We may not be able to control how these insurance producers (including insurance agents) or referral partners may use your personal information.
- Insurance carriers. We may share personal information with insurance carriers and reinsurers. We do not control how these insurance carriers (including reinsurers) may use your personal information.
- Consumer reporting agencies. We may share personal information with consumer reporting agencies (such as credit reporting agencies, MIB Group, Inc. (and its affiliated entities) and other similar entities). Information obtained from a consumer reporting agency or insurance support organization may be retained by such entity and disclosed to other persons. We do not control how these consumer reporting agencies may use your personal information.

- Advertising partners. We may share personal information with third-party advertising companies for the interest-based advertising purposes described above. We may not be able to control how advertising partners may use your personal information.
- Third parties designated by you. We may share personal information with third parties where you have instructed us or provided your consent to do so. For example, we may share your personal information with your authorized representatives, agents and beneficiaries. We do not control how these third parties may use your personal information.
- Business and marketing partners. We may share certain personal information with third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or with entities whose products or services may be of interest to you. We may not be able to control how these business and marketing partners may use your personal information.
- Professional advisors. We may share personal information with professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.
- Authorities and others. We may share personal information with law enforcement, government authorities (such as insurance regulators), and private parties, as we believe in good faith to be necessary or appropriate for the “Compliance with legal obligations and co-operation with others” and “Protection and enforcement of rights” described above.
- Business transferees. We may share personal information in the context of actual or prospective business transactions (including investments in and/or financings of Ethos; and/or the sale, transfer or merger of all or part of our business, assets or shares). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Ethos as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.
- Medical institutions (including medical providers). We may share your personal information with medical institutions (including, without limitation, medical providers) as needed to analyze and/or verify insurance coverage or benefits; inform you of a medical issue of which you may not be aware; and/or as a part of an operations or services audit to verify you have been treated by the medical institution.
- Other users and the public. We may share certain of your personal information (for example, your feedback regarding our products and/or Service) to other users of the Service and the public. This information can be seen, collected and

used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information.

We make commercially reasonable efforts to verify that the parties with whom our Service shares personal information provide a level of protection of personal information consistent with the practices described in this Online Privacy Policy, except that all such parties described above other than service providers and affiliates may, to the extent permitted by law, use personal information as described in their own privacy policies.

Your Choices

In this section, we describe the rights and choices available to all Service visitors. Service visitors who are California residents can review additional information about their rights in the [Notice to California Residents](#) below.

Access or update your information

If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

Opt out of marketing communications

You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. Please note that if you choose to opt out of marketing emails, you may continue to receive service-related and other non-marketing emails.

If you receive marketing text and/or SMS messages from us, you may opt out of receiving further marketing text and/or SMS messages from us by replying STOP to our marketing message.

Cookies and other tracking technologies

For information about cookies and other tracking technologies employed by the Service and how to control them, see our Cookies and Other Tracking Technologies Notice.

Advertising choices

You may be able to limit use of your information for interest-based advertising. Please view the Online Tracking Opt-Out Guide for additional information.

Do not track

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. Currently, we do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information

We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Delete your content or close your account

You may be able to delete certain content through your account settings. If you wish to request to close your account, please [contact us](#). If you are a policyholder for an Insurance Product, please follow the cancellation or termination provisions in your policy.

Other Sites and Services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security Measures

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies. We cannot guarantee the security of your personal information. Please visit our [Data Security webpage](#) to learn more about our efforts designed to protect your personal information.

International Data Transfers

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service, Insurance Products and Estate Planning Documents are not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Online Privacy Policy

We reserve the right to modify this Online Privacy Policy at any time. If we make material changes to this Online Privacy Policy, we will notify you by updating the date of this Online Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Online Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Online Privacy Policy indicates your acknowledging that the modified Online Privacy Policy applies to your interactions with the Service and our business.

How to Contact Us

- Email: privacy@getethos.com
- Mail: 1606 Headway Cir., #9013, Austin, TX 78754
- Phone: 415-915-0665

Notice to California Residents

Scope

This section applies only to California residents. This section describes how we collect, use, and share Personal Information of California residents in our capacity as a "business" under the California Consumer Privacy Act ("CCPA") and their rights with respect to that Personal Information. For purposes of this section, the term "Personal

Information” has the meaning given in the CCPA but does not include information exempted from the CCPA (such as information that is governed by the federal Gramm-Leach-Bliley Act or the California Financial Information Privacy Act). In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

California privacy rights

California residents have the rights listed below under the CCPA. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- *Information.* You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected
 - The categories of sources from which we collected Personal Information
 - The business or commercial purpose for collecting and/or selling Personal Information
 - The categories of third parties with whom we share Personal Information
 - The categories of Personal Information that we sold or disclosed for a business purpose
 - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose
- *Access.* You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- *Deletion.* You can ask us to delete the Personal Information that we have collected from you.
- *Opt-out of sales.* You can opt out of any sale of your Personal Information.
- *Opt in.* We do not knowingly collect the Personal Information of individuals under the age of 16. If we know that you are 13-15 years of age, we will ask for your affirmative authorization to sell your Personal Information before we do so.
- *Nondiscrimination.* You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

Exercising rights to information, access and deletion

You may submit requests to exercise your right to information, access or deletion at privacy@getethos.com.

Notice of right to opt out of the “sale” of Personal Information

Like many companies, we may use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as a “sale” of your Personal Information to the advertising partners that provide the services because they collect information from our individuals on our Sites (for example, device data and online activity data) to help them serve advertisements more likely to interest you. You can request to opt out of this “sale” of your personal information by emailing us at privacy@getethos.com.

General information for exercising your rights

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information, access and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require government identification, a declaration under penalty of perjury or other information.

Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

Personal Information that we collect, use, and disclose

The chart below summarizes the Personal Information we collect by reference to the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140) and describes our practices currently and during the 12 months preceding the effective date of this Online Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Statutory category of Personal Information (“PI”) ([Cal. Civ. Code § 1798.140](#))

Commercial information (only in relation to individuals using the Service for Estate Planning Documents)

PI we collect in this category (See [“Personal information: How we collect and generate it”](#) above for description)

- Contact data
- Financial data
- Transactional data

PI Sources

- You
- Affiliates
- Third party sources

Business / commercial purpose for collection

See “[How We Use Your Personal Information](#)”

Categories of third parties to whom we “disclose” PI for a business purpose

- Ethos affiliates
- Service providers
- Advertising partners
- Business and marketing partners
- Professional advisors
- Authorities and others
- Business transferees

Categories of third parties to whom we “sell” PI

- None

Statutory category of Personal Information (“PI”) ([Cal. Civ. Code § 1798.140](#))

Identifiers

PI we collect in this category (See “[Personal information: How we collect and generate it](#)” above for description)

- Contact data
- Device and online identifiers and related data
- Internet, application and network activity data

PI Sources

- You

- Affiliates
- Third party sources
- Cookies and Other Tracking Technologies

Business / commercial purpose for collection

See “[How We Use Your Personal Information](#)”

Categories of third parties to whom we “disclose” PI for a business purpose

- Ethos affiliates
- Service providers
- Advertising partners
- Business and marketing partners
- Professional advisors
- Authorities and others
- Business transferees

Categories of third parties to whom we “sell” PI

- Advertising partners

Statutory category of Personal Information (“PI”) ([Cal. Civ. Code § 1798.140](#))

Internet or Network Information

PI we collect in this category (See “[Personal information: How we collect and generate it](#)” above for description)

- Device and online identifiers and related data
- Marketing data
- Internet, application and network activity data
- Location data

PI Sources

- You
- Affiliates
- Third party sources
- Cookies and Other Tracking Technologies

Business / commercial purpose for collection

See [“How We Use Your Personal Information”](#)

Categories of third parties to whom we “disclose” PI for a business purpose

- Ethos affiliates
- Service providers
- Advertising partners
- Business and marketing partners
- Professional advisors
- Authorities and others
- Business transferees

Categories of third parties to whom we “sell” PI

- Advertising partners

Statutory category of Personal Information (“PI”) ([Cal. Civ. Code § 1798.140](#))

Online Identifiers

PI we collect in this category (See [“Personal information: How we collect and generate it”](#) above for description)

- Device and online identifiers and related data
- Marketing data
- Internet, application and network activity data
- Location data

PI Sources

- You
- Affiliates
- Third party sources
- Cookies and Other Tracking Technologies

Business / commercial purpose for collection

See [“How We Use Your Personal Information”](#)

Categories of third parties to whom we “disclose” PI for a business purpose

- Ethos affiliates

- Service providers
- Advertising partners
- Business and marketing partners
- Professional advisors
- Authorities and others
- Business transferees

Categories of third parties to whom we “sell” PI

- Advertising partners

Statutory category of Personal Information (“PI”) ([Cal. Civ. Code § 1798.140](#))

Sensitive Personal Information (only in relation to individuals using the Service for Estate Planning Documents)

PI we collect in this category (See “[Personal information: How we collect and generate it](#)” above for description)

- Financial data
- Government-issued identification data

PI Sources

- You
- Affiliates
- Third party sources

Business / commercial purpose for collection

See “[How We Use Your Personal Information](#)”

Categories of third parties to whom we “disclose” PI for a business purpose

- Ethos affiliates
- Service providers
- Professional advisors
- Authorities and others
- Business transferees

Categories of third parties to whom we “sell” PI

- None

Disclosures of personal information to third parties for their direct-marketing purposes

California residents may send requests to privacy@getethos.com for identification of third parties to whom we have disclosed your personal information during the preceding calendar year for such third parties' direct-marketing purposes. In your request, you must include the statement "Shine the Light Request" and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or fax, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.