



## NSD's Compliance Statement Safeguards Rule

### Our Commitment

Nation Motor Club, LLC d/b/a Nation Safe Drivers, NIU of Florida, Inc., National Adjustment Bureau, LLC, Nation Safe Drivers Services, Inc, and National Insurance Underwriters, LLC (collectively, "NSD") values the trust that you put in us to safeguard nonpublic personal information about your customers, whether in paper, electronic, or other form, that is handled or maintained by or on behalf of you or your affiliates ("Customer Information").

NSD is committed to ensuring the security, confidentiality, integrity, and protection of all Customer Information that we receive, maintain, process, or otherwise are permitted access to, including through the safeguards referenced herein, and to providing a compliant and consistent approach to data protection.

NSD is dedicated to safeguarding the personal information under our remit and in maintaining a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the Federal Trade Commission's Standards for Safeguarding Customer Information (the "Safeguards Rule"). We have summarized in this statement certain of our important safeguards currently in effect, and we will continue to develop and enhance these safeguards from time to time based on the nature of Customer Information at issue, the development of security threats, and your needs and the needs of our other customers and business partners.

- **Policies & Procedures** - We maintain data protection policies and procedures to meet the requirements of applicable data protection laws, including: -
  - **Data Protection** – Our main policy and procedure document for data protection has been overhauled to meet the standards and requirements of the Safeguards Rule. Accountability and governance measures are in place to ensure that we understand and disseminate and evidence our obligations and responsibilities, with a dedicated focus on privacy by design and the rights of individuals.
  - **Data Retention and Erasure** – We have updated our retention policy and schedule to help ensure that we meet best practices with respect to 'data minimization' and 'storage limitation' and to help ensure that personal information is stored, archived, and destroyed compliantly and ethically.
  - **Data Breaches** – Our breach procedures are designed to ensure that we have safeguards and measures in place to identify, assess, investigate, and report any personal data breach at the earliest possible time. Our procedures have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
  - **Data Transfers & Third-Party Disclosures** – NSD has robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of all Customer Information.
  - **Privacy Notice/Policy** – We have revised our Privacy Notice(s) ensuring that all individuals whose personal information we may process, if applicable, have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information. A current copy of our Privacy Notice(s) is available upon request.
  - **Obtaining Consent** - We have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
  - **Direct Marketing** – We have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.
  - **Processor Agreements** – Where we use any third-party to process personal information on our behalf (i.e., *Payroll, Recruitment, hosting etc.*), Processor Agreements are in place that require

the third party to safeguard the confidentiality of all such information. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organizational measures in place and compliance with the Safeguards Rule.

### **Information Security and Technical and Organizational Measures**

NSD takes the privacy and security of Customer Information very seriously and takes every reasonable measure and precaution to protect and secure the Customer Information that we may receive, maintain, process, or are otherwise permitted to access. We have robust information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure, or destruction and have several layers of security measures, including: -

- SSL
- Access Controls
- Password Policy
- Encryptions
- Restrictions
- Authentication

### **Safeguards Rule Roles and Employees**

NSD has designated Blake Nielson and Michael Sothen as our Privacy and Data Protection Officers and have appointed a data privacy team to develop and implement our roadmap for safeguarding the security, confidentiality, integrity, and protection of all Customer Information we receive, maintain, process, or are otherwise permitted to access. The team is responsible for promoting awareness of the rules across the organization, assessing our readiness, identifying any gap areas, and implementing the new policies, procedures, and measures.

NSD understands that continuous employee awareness and understanding is vital to the continued compliance for purposes of the Safeguards Rule and have involved our employees in our preparation plans. Privacy forms are part of our induction and annual training program. If you have any questions about our preparations, please contact [privacy@nationsafedrivers.com](mailto:privacy@nationsafedrivers.com).