Privacy Policy

American Safety Net Association (ASNA), a non-for-profit organisation under the laws of Arizona, USA, will be referred to in this policy as ASNA.

Where this policy mentions "we," "us," or "our," it may mean ASNA or the 3rd party Benefit Providers, the companies who are responsible for your information who also act as the "Data Controllers" and “Data Processors”.

Where this policy mentions “ASNA” it exclusively refers to ASNA.

Where this policy mentions “You”, “your”, “members”, or “member”, it means the person giving this consent, and a person who may be identified in any insurance policy, membership benefit plan, that you receive, applied for or obtained.

ASNA is a non-for-profit organisation set up to help working American and empower individuals to save and protect their financial future. A fundamental part of what we do is through trust and security, this means being clear about how we use your information and protecting your privacy. This Privacy Policy explains how we collect, use, and protect your personal information, this policy also explains how you can access the data we process and hold. This policy also explains how you can access the data we process and hold. Certain information about you will be disclosed to third party companies for the purposes of the ASNA membership.

By using this website, using our service, and becoming an ASNA member, you consent to our collection and use of your personal information as required and necessary, and you agree to the practices described in this policy. If you do not agree or have questions or have questions, you can contact ASNA at privacy@asna.org

Where this policy mentions “benefits”, “plans”, “service” and “services”, it may mean customer service, member benefits plans, or the services offered as a part of the ASNA membership.

Where this policy mentions “Benefit Providers”, it means the companies that provide you with the benefits, services, plans, etc, that are inclusive of the ASNA membership. ASNA works with 3rd party Benefit Providers who are independent to ASNA and who provide you with services and offers which are a part of your ASNA membership.

Why is your personal information collected?

We collect personal information that is necessary to provide and administer the services and membership and membership. Without this information, we cannot effectively deliver our services.

For ASNA membership enrolment and monthly payment of your ASNA membership your personal information is collected and processed by Strip (https://stripe.com/). ASNA is an organisation who provides you with benefit and services that may be supplied by 3rd parties, due to this, we must gather information about you, this information may include more information than you provided during ASNA membership enrolment. ASNA may pass this information to the Benefit Providers so that, they are able to fulfil their

obligations and services which they are contractually required to provide. ASNA also collects non-personal information to effectively provide website services that support our services.

We may use the information we collect to:

- enable you to access and use your benefits and services provided by the Benefit Providers;
- provide you with discounts, offers, and services provided by Benefit Providers;
- to enroll you to the ASNA membership;
- to provide you with information about your ASNA membership or the services;
- to service and administer your ASNA membership;
- to arrange for the provision of services you request;
- to protect our legal rights or to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements or as otherwise required by law; or
- for purposes to which you've otherwise consented.
- to improve our service.

Who collects and controls your personal information?

We may be required by law to collect certain personal information about you, or because of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. You will be informed at the time.

ASNA is the primary entity responsible for your personal information.

- **As a Data Controller**: ASNA and the Benefit Providers are independent Data Controllers. Each will determine why and how your personal information is collected, used, and shared when we provide services.

- **As a Data Processor**: ASNA and the Benefit Providers are independent Data Processors. Each will determine why and how your personal information is processed. In those cases, we act under our contractual obligations. Processing includes the collection, analysis, recording, organization, storage, of personal data.

What information is collected?

We only save the collected personal information when you complete your ASNA membership enrolment. The information collected is considered necessary and legitimate. The information collected is solely for providing the membership, benefits, and services.

We collect such information as your names, date of birth, email, contact number, home address, monthly home rental amount, description of the incident leading to the loss, personal monthly income, employment information, employment documentation. We may require additional information depending on the nature of the service or request, you will be notified at the time of the request.

We do not sell your data.

How do we collect your information?

Through voluntary disclosure you provide us with your personal information when you enroll in the membership or in the services we offer. During the lifetime of our services, we may ask you to provide us with additional information when you communicate with us or when using a benefit service. You are not required by law to provide us or a benefit provider with your personal information, however, if you choose to decline the requested information, the service may not be provided.

Sources of the information we collect

We collect personal information from you directly when you voluntarily provide it to us, for instance when you purchase the membership or if access your Benefit(s).

We may collect information about you and your benefit usage from the Benefit Providers.

When is your information shared?

We only use your personal information for legitimate purposes and to fulfil our service obligations.

ASNA may share your personal information with the Benefit Providers when you utilise your ASNA benefits and the services of your membership, this is done so that you are able to utilise your membership services and the benefits without disruption.

When data is shared, all parties must manage information securely and in accordance with secure data processing obligations and privacy standards.

We may use your personal information for the following purposes:

Processing Purpose	Personal Information That May Be Used
Membership Enrolment	Your name(s), email, date of birth, contact number, home address, monthly home rental amount, personal monthly income, employment and employment information.
Customer Service	Your name(s), email, contact number, information relating to your query, and images.
Website Service	Performance Cookies
Insurance Claim	Your name(s), date of birth, email, contact number, home address, monthly home rental amount, description of the incident leading to the loss, personal monthly income, employment information, employment documentation.
Discount or Offer	Your name(s), email, home address, email address, date of birth.

This list is not definitive, the description of the information used may include less or additional information, and additional information may be required from time to time depending on the circumstances.

Your Rights

You have certain rights regarding your personal information, subject to local law. These include the following:

Right to Access. You may submit a request to access, the personal information that we have collected about you along with information about our data privacy practices.

Right to Delete: You may submit a request to delete your personal information, doing so may impact our services if not terminated.

Right to Correct: If you believe information we hold on you is inaccurate, you may submit a request to correct inaccuracies in your personal information held by us.

Right of Non-Disclosure: We will not discriminate against you for exercising your rights and choices, however, if you choose to decline our request for information, we may not be able to provide our service obligations which may results in claim dismissal.

Right to Portability: You have the right to receive your personal information in a usable electronic format.

Appeal: You have the right to appeal if for any reason we denied your privacy request.

For any questions or concerns relating to this privacy policy or our data protection practices or if you would like to exercise any of your rights as defined above, please contact us at privacy@asna.org

Exercising Your Rights

You can exercise these rights by contacting us at privacy@asna.org

We will respond to your request as required by law (generally within 30–45 days).

Non-personal information

By using this website, ASNA may automatically collect non-personal information about you such as the type of Internet browsers you use or the website from which you linked to our site. This information and it is only used to assist ASNA in providing an effective service.

When you access this website, ASNA may use cookies for website performance and monitoring purposes. ASNA uses analytical tools (such as Google Analytics) to monitor this website, these services use cookies to transmit your IP address.

Information placed on your computer: ASNA may store some information (commonly known as a “cookie”) on your computer when you look at this website. This information facilitates your use of our website and ensures that you do not need to re-enter your details every time you visit it. You can erase or block this information from your computer if you want to (your help screen or manual should tell you how to do this).

Automated decision making

ASNA and Benefit Providers may use automated decision making when assessing eligibility of the membership or benefits. This automated analysis of information is for the purpose of risk assessment or fraud prevention (may involve customer profiling), this means that we access and process your personal information using software that is able to make evaluation and predictions, also known as “automated decision making”. Where there need exists and a requirement for human intervention and evaluation, we use reasonable efforts to do so, especially in high risk situations.

When could automated decisions about you be made:

- Membership access or purchase.
- Rasing an insurance claim through an ASNA platform or directly with a Benefit Provider.
- Where such decisions are required or authorised by law, for example for fraud prevention purposes
- Where you give your consent to us carrying out automated decision-making.

Subject to local legal requirements and limitations, you can contact us to request further information about automated decision-making, object to our use of automated decision-making, or request an automated decision to be reviewed by a human being.

Artificial Intelligence (AI)

ASNA and benefit providers may use AI systems and tools (including generative AI) to support our activities and for different purposes which we explain in more detail below.

Business Processes: We use AI to improve, simplify, and process our internal organisation operations. We may also use AI to help us summarise information, review image and document form data, or translate information sent by you regarding a request.

Customer Service: We use AI to answer questions you raise through text, chat, or voice call. We use AI to process image data or a document that may be shared to us relating to request. We may use AI to enable us to provide you with a response which may be outside of our normal business operating hours.

Testing & Development: If we use information that has been shared by you for any testing or development of AI, we will anonymise your personal information and do so in accordance with local laws and regulations that protect your privacy. If we use information that has been shared by you for any testing or development of AI, we do so with the intention to provide you with better support and service.

When you are interfacing with an AI, we make it clear that you are doing so. When we process personal information or share your information with 3rd party companies we work with who are listed and named in this policy, we do so on the basis that we have a legitimate interest to do so, we put in safeguards to ensure that your privacy is protected.

AI 3rd party companies:

- https://www.anthropic.com/company | https://www.anthropic.com/legal/privacy
- https://www.openai.com/about/ | https://www.openai.com/policies/privacy-policy/

Security

We have implemented software solutions and policies to safeguard information and maintain privacy.

We follow security procedures in the storage and disclosure of personal information in line with industry practices, including storage in electronic and paper formats.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at privacy@asna.org

Cross Border Transfer

When necessary, your personal information may be transferred outside of your country and stored in another jurisdiction. Where this occurs, we ensure that the organizations receiving and storing your information maintain adequate security and privacy safeguards, including industry best practice compliance and standards.

In some cases, we may be contractually or legally required to transfer your information. This may include transfers to licensed insurance companies, general managing agencies, reinsurance companies, insurance brokers, or other service providers involved in the insurance policy or claim you have purchased.

Data Retention

Your personal details are stored for no longer than is necessary in offering the services or to comply with our legal or regulatory requirements. We will securely delete or erase your personal information if there is no valid business reason for retaining your data. In exceptional circumstances, we may retain your personal information for longer periods of time if we believe there is a prospect of litigation, in the event of any complaints or there is another valid business reason the data will be needed in the future.

For any questions or concerns relating to this privacy policy or our data retention practices, please contact us at privacy@asna.org

Children's Privacy

Our services are not directed to children under 13 (or under 16 in jurisdictions where higher limits apply), and we do not knowingly collect information from them. If we discover such collection, we will delete the data promptly.

Updates

ASNA may update this Privacy Policy from time to time to reflect changes in our services, legal requirements, or how we process personal information.

If the changes are material and significant, ASNA will provide a clear notice, which may include sending you an email, displaying a notice on our website or app, or requesting your renewed acknowledgement where required.

Any updates will take effect when they are published, unless a different effective date is stated. Your continued use of our services after the revised Privacy Policy becomes effective means you acknowledge the updated terms.

Appendix A – State-Specific Privacy Rights

This Appendix supplements our Privacy Policy and applies to residents of certain U.S. states. If you live in one of the states listed below, you may have additional rights under your state's privacy laws. Where state law conflicts with this Policy, your state law will apply.

California (CCPA/CPRA)

If you are a California resident, you have rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA):

- Right to Know what categories of personal information we collect, use, and disclose.
- Right to Access the specific personal information we hold about you.
- Right to Delete your personal information, subject to certain exceptions.
- Right to Correct inaccurate personal information.
- Right to Data Portability to receive your data in a portable format.
- Right to Limit Use of Sensitive Personal Information, if applicable.

- Right to Opt-Out of Sale or Sharing of Personal Information. We do not sell your personal information for monetary value, but we may share information with service providers as permitted by law.
- Right to Non-Discrimination if you exercise these rights.

Colorado (CPA), Connecticut (CTDPA), and Virginia (VCDPA)

Residents of these states have the following rights:

- Right to Confirm whether we process your personal data
- Right to Access the personal data we process about you
- Right to Correct inaccuracies
- Right to Delete personal data provided by or obtained about you
- Right to Data Portability
- Right to Opt-Out of:
    - Targeted advertising
    - Sale of personal data
    - Certain types of profiling

You also have the right to appeal if we decline your request. Instructions on how to appeal will be included in our response.

Utah (UCPA)

Utah residents have similar rights but with some limitations:

- Right to Access
- Right to Delete
- Right to Data Portability
- Right to Opt-Out of the sale of personal data or targeted advertising

Texas (TDPSA)

Texas residents have rights similar to Colorado and Virginia, including:

- Right to Know and Access
- Right to Correct
- Right to Delete
- Right to Portability
- Right to Opt-Out of sale, targeted advertising, or profiling

We will respond to verified Texas consumer requests within 45 days, with a possible 45-day extension if reasonably necessary.

Nevada

Nevada law (NRS 603A) provides a right for residents to opt out of the sale of covered information. STP does not sell covered information as defined under Nevada law.