

Freedom Insurability Group, and its related, affiliated and subsidiary companies (jointly “Fig,” “Freedom Insure Group”, “Freedom Insurability Group LLC”, “us,” or “we”) are committed to keeping all of your personal information secure. This Online Privacy Policy (this “Privacy Policy”) explains how we use and protect personal information that Freedom Insurability Group collects from you (the customer) online.

If you are a California resident, please see our [California Privacy Policy](#), which provides additional details about how we handle your personal information and how you can exercise your rights under the California Consumer Privacy Act.

1. Scope and Consent

This Privacy Policy governs your use of the FreedomInsureGroup.com, freedominsuregroup.com and AutoandHome.FreedomInsureGroup.com websites, as well as any other site that posts this Privacy Policy (the “Website” or the “Site”), and also applies to your use of interactive features, widgets, applications, content or downloads that we make available through the Website and that post this Privacy Policy (collectively referred to herein as the “Services”), regardless of how you access or use the Services, whether via personal computers, mobile devices or otherwise, but does not apply to data we receive from third parties unless we combine such data with Personal Information (defined below) that we have ourselves collected under this Privacy Policy.

This Privacy Policy does not apply to our data collection offline, including during telephone calls you may have with Freedom Insurability Group personnel, Freedom Insurability Group representatives, or otherwise outside of our Services (unless otherwise stated below). Our statements under this Privacy Policy cover only information collected through the Services directly by us, and not by third parties that may interact with our Services or link to this Website.

To the extent we provide you notice on this Site of different or additional privacy policies or practices (e.g., at the point of our collection), those additional terms shall govern such data collection and use.

By using the Services and/or by submitting inquiries through the Services, you explicitly agree to the terms and conditions of the Privacy Policy in effect at the time of your use.

2. Changes to This Privacy Policy

We may add to, update, delete from or modify our Privacy Policy at any time in our sole discretion. We reserve the right, at any time and in our sole discretion, to change the Privacy Policy. We may post or display notices of changes to the Privacy Policy on this Site. Once posted, these changes to the Privacy Policy become effective immediately.

If any change that we make is not acceptable to you, promptly stop using our Services. If you continue to use our Services, doing so is your agreement to be bound by those changes. You should check back regularly and review this Privacy Policy so that you are aware of the most current rights and obligations which apply to your agreement with us. Nothing in this Privacy Policy shall be deemed to confer any third-party rights or benefits to you.

3. What information do we collect?

3.1 Information You Provide to Us

We do not collect “Personal Information” about you through the Services unless you choose to provide it to us voluntarily, such as through the “Get Your Free Quote”, “Term Life Insurance Calculator” or a similar page. We define Personal Information as information that is unique to you and might include your phone number, biometric information (such as your height and weight), name, address, email address, Social Security Number, birthdate, and certain medical or health information.

We may also collect demographic information, such as information about your gender and age (“Demographic Information”) when you enter information in the “Get Your Free Quote,” “Term Life Insurance Calculator” or similar page.

If you encounter a screen or page that requests information you do not want to share with us, do not enter the information and do not proceed with that screen or page.

If you do provide us with Personal Information, we will use it for the purpose of obtaining a quote, calculating a term life insurance policy, or for the purpose otherwise stated on the page collecting the Personal Information, and we will not license, transmit or disclose this information to third parties unless: (1) you expressly authorize us to do so, (2) it is necessary to allow our contractors or agents to provide services for us, (3) in order to provide our products or services to you, (4) it is disclosed to entities that perform marketing services on our behalf or to other entities with whom we have joint marketing agreements, (5) it is disclosed to insurance providers for us to obtain an insurance quote on your behalf or to connect you with insurers who provide products in your area in which you may be interested, or (6) otherwise as we are required or permitted by applicable law. We may also use the information you choose to provide to us to improve the content of this Site and our Services or to contact you for marketing purposes.

3.2 Information Others Provide to Us About You

We may, from time to time, supplement the information we collect directly from you on our Services with outside records from third parties, such as credit reports or driving history, for various purposes, including underwriting an insurance application, to enhance our ability to serve you, to tailor our content to you and to offer you opportunities that may be of interest to you. To the extent we combine information we receive from those sources with your Personal Information we collect on the Service, it will be treated as Personal Information and we will apply this Privacy Policy to such combined information, unless we have disclosed otherwise.

3.3 Information We Collect When You Use the Services

In addition to any Personal Information, or other information that you choose to submit to us (as described above), we and our third-party service providers may use a variety of technologies that store or collect certain information whenever you visit or interact with the Services (“Usage Information”). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device (a “Device”) whenever you visit or interact with our Services. To the extent we associate Usage Information with your Personal Information we collect directly from you on the Services, we will treat your Usage Information as your Personal Information.

Usage Information may include:

- your IP address, UDID or other unique identifier (“Device Identifier”). A Device Identifier is a number that is automatically assigned to your Device used to access the Services, and our computers identify your Device by its Device Identifier;
- your Device functionality (including browser, operating system, hardware, mobile network information);
- the URL that referred you to our Services;
- the areas within our Services that you visit and your activities there, including remembering you and your preferences;
- your Device location;
- your Device characteristics; and
- certain other Device data, including the time of day, among other information.

3.4 Information Collected Through Tracking Technologies

A. Types of Tracking Technologies We Use

We may use a variety of tracking technologies to automatically collect Usage Information and Demographic Information, including, but not limited to, cookies, web beacons, embedded scripts, browser fingerprinting, GPS, iBeacons, and ETags (collectively “Tracking Technologies”). Tracking Technologies may set, change, alter, or modify settings or configurations on your Device.

A cookie (or “locally shared object”) is a data file placed on your device when you visit our site. Your browser, or other software (including Adobe Flash), may allow you to reject or remove cookies, but if you do so, some features of our Services may not work properly, and we may not be able to remember your preferences the next time that you visit. We also use web server logs to collect and store information about usage of our Services. When you use the Services from a mobile device, like a smartphone, we may also collect additional information from your device, including your location, Device Identifier and information about your mobile network.

We also rely on Tracking Technologies for purposes of session replay and pixel tracking, which collect Usage Information that tracks your interactions with our Services, including mouse movements, text, and other information, associated with your visit to our Services. This information is used to help us improve our Services and better provide you with information you are interested in when you visit our Services. For more information about how these technologies process your information, please review our vendor’s [privacy policy here](#).

B. Purpose of Tracking Technologies

We may use Tracking Technologies for a variety of purposes, including:

i. When Strictly Necessary to Provide the Services

We may use Tracking Technologies that we consider strictly necessary to allow you to use and access the Services, including cookies required to prevent fraudulent activity and improve security.

ii. To Assess Performance

We may use Tracking Technologies that are useful in order to assess the performance of the Services, including as part of our analytic practices or otherwise to improve the content or services offered through the Services.

iii. To Improve Functionality

We may use Tracking Technologies to offer you enhanced functionality when accessing the Services, including identifying you when you visit this Site or keeping track of your specified preferences, including in terms of the presentation of content on this Site.

iv. To Deliver Relevant Content

We may use Tracking Technologies to deliver content relevant to your interests on the Services and third-party sites based on how you interact with the Services. This includes using Tracking Technologies to understand the usefulness to you of the content that has been delivered to you.

C. Tracking Technologies Choices and Consent

We obtain your consent to our collection of Usage Information and Demographic Information through using Tracking Technologies by providing you with transparent information in this Privacy Policy and providing you with the opportunity to make a choice to disable cookies as set forth above. Please note that we are not required to obtain your consent to our use of Tracking Technologies identified above that are strictly necessary.

We are giving you detailed notice of the Tracking Technologies and your limited choices regarding them so that your consent is meaningfully informed.

D. Third-Party Tracking

There may be other Tracking Technologies now and later devised and used by us in connection with the Services. Further, third parties may use Tracking Technologies in connection with the Services, which may include the collection of information about your online activities over time and across third-party web sites or online services. We may not control those Tracking Technologies and we are not responsible for them. However, you consent to potentially encountering third-party Tracking Technologies in connection with use of the Services and accept that our statements under this Privacy Policy do not apply to the Tracking Technologies or practices of such third parties.

E. Do Not Track

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. California Business & Professions Code Section 22575(b) provides that California residents are entitled to know how Freedom Insurability Group responds to “Do Not Track” browser settings.

There currently is no consensus among industry participants as to what “Do Not Track” means in this context. Therefore, like many websites and online services, our Services do not alter their practices when they receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” please visit allaboutdnt.com.

F. Disabling Tracking Features

Regular cookies may generally be disabled or removed by tools that are available as part of most commercial browsers, and in some but not all instances can be blocked by selecting certain settings. We use tracking and advertising products provided by Google. You may learn more about Google's use of cookies by visiting the [Google advertising opt-out page](#).

Each browser you use will need to be set separately and different browsers offer different functionality and options in this regard. Also, these tools may not be effective with regard to Flash cookies or HTML5 cookies or other Tracking Technologies. For information on disabling Flash cookies go to Adobe's website adobe.com.

Please be aware that if you disable or remove these technologies, some parts of our Services may not work and that when you revisit this Site your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

4. How do we use the information collected?

We may use your Personal Information, Demographic Information and/or Usage Information that we collect about you subject to this Privacy Policy for the following purposes:

- to provide you with information or services that you have requested or agreed to receive or to provide you with marketing information or services on behalf of us or third parties;
- to obtain an insurance quote (or Medicaid premium quote) on your behalf or to connect you with insurance companies in whose products you may be interested;
- to respond to a legitimate claim, judicial process or request from law enforcement agency as permitted or required by law;
- to enable you to participate in a variety of the Services' features;
- to process an inquiry submitted through the Services, including verifying your information is accurate and valid;
- to improve our Services or their functionality, or to customize your experience on the Services, or to serve you specific content that is relevant to you;
- to contact you with regard to your use of the Services and, in our discretion, changes to the Services and/or Services' policies;
- for internal business purposes; and
- for purposes disclosed at the time you provide your information to us or as otherwise set forth in this Privacy Policy.

4.1 To Develop Services, Provide Support and Improve Security

We may use your Personal Information, Demographic Information and/or Usage Information to conduct research and further develop our Services. In some cases, we may work with trusted third parties to perform research.

We may use Personal Information, Demographic Information and/or Usage Information (which can include your communications to us) to investigate, respond to and resolve complaints and security issues. We may use such information to investigate violations of our [Terms of Use](#) or this Privacy Policy.

4.2 To Promote Communications

We may use your Personal Information to facilitate communication with you through, for example, email, telephone or mobile phone. We may contact you by telephone to discuss in greater detail any request for an insurance quote you may have requested. We may send you messages about the availability of our Services, security or other service-related issues. We may also send messages about how to use the Services, network updates, reminders, promotional messages or to communicate with you regarding insurance policy quotes or Medicaid plan premiums. While you may change your communication preferences at any time, please be aware that you cannot opt-out of receiving service messages from us, such as security and legal notices.

4.3 Provide Advertising (and Location-Based Services)

We may also use your Personal Information, Demographic Information or Usage Information that we collect about you: (1) to specifically target relevant advertisements or content to you based on how you interact with our Services; (2) to understand the usefulness to you of the advertisements or content that have been delivered to you; and (3) to increase this Site's functionality, including allowing you to comment or add content to the Services.

5. Sharing of Information with Third Parties

We may share non-Personal Information, such as aggregated user statistics, with third parties. We may share your Device Identifiers with third parties along with data related to you and your activities. We do not share your Personal Information that you have provided, through using our "Get Your Free Quote", "Term Life Insurance Calculator" or a similar page with third parties for those third parties' direct marketing purposes.

If we de-identify data about you, it is not treated as Personal Information by us, and we may share it with others freely. In addition, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described below or otherwise in this Privacy Policy. We may also share information with third parties as described below.

Freedom Insurability Group will not sell your Personal Information to third parties

5.1 When You Request Information From or Provide Information to Third Parties

You may be presented with an option through our Services to receive certain information from third parties, or to have us send certain information to third parties or give them access to it. Also, links to third parties' websites may appear on our Site.

If you choose to do so, you may disclose your Personal Information and other information to such third parties and all information you disclose will be subject to the third-party's privacy policies and practices.

In addition, third parties may store, collect or otherwise have access to your information when you interact with their Tracking Technologies, content, tools, apps or ads on our Services. By using those

third-party tools, you acknowledge that you are subject to those third-parties' practices and policies regarding Tracking Technology.

We are not responsible for the privacy policies and practices of third parties and, therefore, you should review any third-party privacy policies and practices prior to requesting information from them or otherwise interacting with them.

5.2 When Third Parties Provide Services on Our Behalf

We may use third-party vendors to perform certain services on our behalf, such as hosting this Site, designing and/or operating the Services' features, tracking the Services' activities and analytics, and other administrative services.

We may provide these vendors with access to your information to carry out the services they are performing for you or for us. Third-party analytics and other service providers may set and access their own Tracking Technologies on your Device and they may otherwise collect or have access to information about you, potentially including your Personal Information. We are not responsible for those third-party technologies or activities arising out of them. We are not responsible for the effectiveness of or compliance with any third-parties' opt-out options.

5.3 To Protect the Rights of Freedom Insurability Group and Others

To the fullest extent permitted by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate:

(i) To protect or defend the rights, safety, or property of Freedom Insurability Group or third parties, including through the enforcement of this Policy, our [Terms of Use](#), and other applicable agreements and policies; or

(ii) To comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders).

To the fullest extent permitted by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest requests for such disclosures, without notice to you.

5.4 In the Event of a Business Transfer

We reserve the right to disclose and transfer all such information:

(i) To a subsequent owner, co-owner or operator of this Site or applicable database; or

(ii) In connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, including, during the course of any due diligence process.

Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

6. Third-Party Content and Links to Third-Party Sites

The Services may contain content that is supplied by third parties, and such third parties may collect Usage Information, Demographic Information and your Device Identifier when you use the Services. In addition, when you use the Services, you may be directed to other services that are operated and controlled by third parties that we do not control.

We are not responsible for the data collection and privacy practices employed by any of these third parties or their services and they may be tracking you across multiple sites and may be sharing the results of that tracking with us and/or others.

For example, if you “click” on a link, the “click” may take you off this Site onto a different site. These other sites may associate their Tracking Technologies with you, independently collect data about you, including Personal Information, and may or may not have their own published privacy policies.

Third-party applications may also be available via the Services. The owners of these applications (“Third-Party Owners”) may collect Personal Information, Demographic Information, Usage Information and/or other data from you and may have their own policies and practices. We are not responsible for how Third-Party Owners or their applications collect or use your information and they may be tracking you across multiple sites and may be sharing the results of that tracking with us and/or others.

These Third-Party Owners may have their own terms of service, privacy policies or other policies and ask you to agree to the same. We are not responsible for these third-party privacy policies or the practices of Third-Party Owners. Be sure to review any available policies before submitting any personally identifiable information to a third-party application or otherwise interacting with it and exercise caution in connection with these applications. We also encourage you to note when you leave this Site and to review the third-party privacy policies of all third-party locations and exercise caution in connection with them.

7. Our Participation in Advertising Networks

The Services may, at our discretion, use third parties such as network advertisers and ad exchanges to serve advertisements on the Services and may use third-party analytics and other service providers to evaluate and provide us and/or third parties with information about the use of the Services and viewing of ads and of our content. Network advertisers are third parties that display advertisements, which may be based on your visits to the Services and other apps and sites you have visited. Third-party ad serving enables us to target advertisements to you for products and services in which you might be interested.

7.1 Network Advertisers May Use Their Own Tracking Technologies

The Service’s third-party ad network and exchange providers, the advertisers, the sponsors and/or traffic measurement services may themselves set and access their own cookies (including Flash cookies), web beacons and other Tracking Technologies on your Device and track certain behavioral Usage Information regarding users of your Device via a Device Identifier.

These third-party Tracking Technologies may be set, among other things:

- (i) to help deliver advertisements to you that you might be interested in;
- (ii) to prevent you from seeing the same advertisements too many times; and
- (iii) to understand the usefulness to you of the advertisements that have been delivered to you.

You acknowledge and agree that associated technology may access and use your Device and may set or change settings on your Device in connection with the associated operations. Note that any images or any other parts of content provided by third parties in association with third-party ads or other content may serve as web beacons, which enable third parties to carry out the previously-described activities.

7.2 Freedom Insurability Group is Not Responsible for Third-Party Tracking

Third-party Tracking Technologies used by network advertisers are not controlled by us. Statements regarding our practices do not apply to the methods for collecting information used by these third-party advertisers and others or the use of the information that such third parties collect. We have provided you with information below on their practices and available opportunity to exercise choice with respect to their Tracking Technology.

You should review the relevant third party's terms of service, privacy policy, permissions, notices and choices should be reviewed regarding their collection, storage and sharing practices.

We make no representations regarding the policies or practices of third-party advertisers or advertising networks or exchanges or related third parties.

7.3 Network Advertising Opt Out

Further, while we may use a variety of companies to serve advertisements on the Service, you may wish to visit networkadvertising.org/optout, which provides information regarding this practice by Network Advertising Initiative ("NAI") members, and your choices regarding having this information used by these companies, including the "opt-out" procedures of NAI members. Opting out of one or more NAI members only means that those NAI members no longer will be allowed under their own rules to deliver targeted content and/or ads to you, which will affect this and other sites, but does not mean you will no longer receive any targeted content and/or ads. Also, if your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different Device or change web browsers, your NAI opt-out may not, or may no longer, be effective. Additional information is available on the NAI's web site accessible by the above link. You may also opt-out of receiving third-party behavioral ads on this site by visiting the Digital Advertising Alliance ("DAA") web site at optout.aboutads.info. Similar limitations may apply to the DAA opt-out. We are not responsible for effectiveness of, or compliance with, any third-parties' opt-out options or programs.

8. Children Under the Age of 13

We offer the Services to businesses and individuals for the purchase and sale of life policy settlements, and it is not intended for use by minors, including children under the age of 13. We do not knowingly collect personal information from children under the age of 13 such that parental notice and consent under the Children's Online Privacy Protection Act ("COPPA") would be required. If you are a child under 13 years of age, you are not permitted to use the Services and you should exit this Site immediately.

In the event that we become aware that we have collected personal information from any child, we will dispose of that information in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of 13 has provided us with personal information without COPPA-required consent, please contact us at info@freedominsuregroup.com.

9. Update and Accuracy of Personal Information

Keeping information accurate and up to date is important to us. An individual may see and correct their Personal Information that we collect. Contact us at the address provided below if you wish to verify your personal information.

If you request that we delete your Personal Information, please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media. We may retain some of your Personal Information even after you have asked to have it deleted if reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, or enforce our [Terms of Use](#). We may retain de-personalized information after your account has been closed.

To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access, making corrections or deleting your Personal Information.

10. You May Opt Out of Receiving Marketing Materials at Any Time

You may cancel or modify our email marketing communications you receive from us by following the instructions contained within our promotional emails, or in some cases by logging into your Services account and changing your communication preferences.

If you subscribe to text messages from us, you can terminate a particular text message subscription by reply texting "STOP." Subsequent or different subscriptions will be unaffected. Please note that we reserve the right to send you certain communications relating to your account or use of our Services, such as administrative and service announcements and these transactional account messages may be unaffected if you choose to opt-out from receiving our marketing communications.

11. Security Safeguards

We endeavor to incorporate commercially reasonable safeguards to help protect and secure your Personal Information and Usage Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure the security of any information you transmit to us and you use our Services and provide us with your information at your own risk.

12. BBBOnline

Freedom Insurability Group participates in the Council of Better Business Bureau's BBBOnline Privacy Program. By doing so, we have made a commitment to meet the program's strict requirements regarding how we treat your information have our compliance verified by BBBOnline. We have our compliance verified by BBBOnline. For further information about this program, you may visit bbb.org.

13. Questions

If you have questions about this Privacy Policy, you may contact Tiburon by writing us at 401 Pine St, Saint Louis, MO 63102, or by emailing us at clientservices@medicarehelpline.com. If you send us an email at info@freedominsuregroup.com with questions or comments about the Services, the Privacy Policy, or the [Terms of Use](#), we will share your messages with those within our organization who are most capable of addressing the issues contained in your message. We will keep a copy of your message

until we have had an opportunity to address your concerns. We may archive your message for a certain period of time or discard it, but your email address will not be used for any other purpose.