

# Independent Community Broker Network Privacy & Cookie Policy

**Privacy Policy** 

Last Updated: November 3, 2023

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### Overview:

This Privacy Policy describes the collection, use, and disclosure practices with respect to Independent Community Broker Network, ICBN, ("us, "we", "our", or the "Company") and its website <a href="https://www.myicbn.com">https://www.myicbn.com</a> (the "Site"), and any other websites or platforms which the Company may create in the future (the "platform").

By using the Independent Community Broker Network, LLC Platform, you consent to the data practices described in this policy. Your use of this Platform and its various web pages constitutes your acceptance and agreement to all terms, conditions, and notices.

We use your Personal Information only for providing and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.

# **Applicability Of HIPAA And GLBA**

We may facilitate the sale of a diverse range of insurance products. The processing of some information on behalf of our agents may fall under another state or federal regulatory framework, like the Health Insurance Portability and Accountability Act ("HIPAA") and related state laws, or the Gramm-Leach-Bliley Act ("GLBA") and related state laws.

We act as a Business Associate, as defined by HIPAA, in the unlikely event that we receive client Protected Health Information ("PHI") from lead vendors or on behalf of a health plan that is a Covered Entity, as defined by HIPAA. As a Business Associate, we collect, use, and disclose PHI to provide services for or on behalf of health plans. For more information about how PHI is used and disclosed, please review the applicable health plan's Notice of Privacy Practices.

When we receive client information pertaining to certain insurance products, we may collect non-public personal financial information, which is regulated by GLBA. For more information about how non-public personal financial information is used and disclosed, please review the GLBA Notice provided by the financial institution that issued the clients' policies or products.

This Privacy Policy applies to personal information that is not covered by HIPAA or GLBA.

### 1. Information We Collect

- **1.1 Personal Information:** We may collect personal information that you provide to us voluntarily. This may include your name, address, email address, phone number, and other information necessary for us to provide our services.
- **1.2Log Data:** We may collect information which your browser sends whenever you visit our Site ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor, and analyze this data.

**1.3 Cookies and Tracking Technologies:** We use cookies and similar tracking technologies to enhance your experience on our Platform. Cookies are small text files stored on your device that help us analyze how you use our Platform and improve our services. You can manage your cookie preference through your

browser settings. Please note that disabling cookies may affect your experience on our Platform.

## 2.0 How We Use Your Information

We may use your personal information for the following purposes:

- **2.1 Providing Services:** We use your personal information to provide you with:
  - Communications about the Platform;
  - Contact Consumers through our independent agents regarding insurance and/or financial products in which the Consumer expressed interest;
  - Address users' inquiries;
  - Process transactions:
  - Analyze the use of our products and services;
  - Comply with legal obligations;
  - Protect our rights, property, and safety or the rights, property, and safety of others; and

we may contact users via email and mail, for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. You may opt out of such communications by contacting us at the toll-free number or email address listed below.

- **2.2 Communication:** You may be contacted via email, phone, or other means to respond to your inquiries, provide updates about our services, and share information relevant to your needs.
- **2.3 Analytics and Improvements:** We use cookies and other tracking technologies to analyze user behavior, improve our Platform's functionality, and enhance user experience.
- **2.4Legal and Regulatory Compliance:** we may use your information as required by law or to comply with regulatory obligations.

### 3.0 How We Share the Personal Information We Collect

We may share your personal information with third parties in the following circumstances:

- **3.1 Service Providers:** We may share your information with trusted third-party service providers who assist us in delivering our services, including insurance carriers and agencies.
- **3.2 Legal Requirements:** We may disclose your information if required by law, court order, or other legal processes.
- **3.3 Consent:** We will obtain your consent before sharing your information with third parties for purposes other than those outlined in this Policy.

# 4.0 Data Security

We take reasonable measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. However, no data transmission over the internet is completely secure, and we cannot guarantee the security of your information.

ICBN may direct you to state regulated industry websites that may request your personal information. Those websites are controlled by their unique Privacy Policies.

### 5.0 Your Choices

You have the following choices regarding your personal information:

### 5.1 Access and Correction:

You can request access to and correction of your personal information held by us. Please contact us using the information provided below.

# **5.2 Marketing Communications:**

You can opt out of receiving marketing communications from us by following the unsubscribe instructions included in our emails.

# 6.0 Children's Privacy

The Platform is not intended for children under 18 years of age. We do not knowingly collect personal information from children. No one under age 18 may provide any information through the Platform. We do not knowingly collect Personal Information from children under 16, and we do not have actual knowledge that we sell or share the Personal Information of children under 16. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the address below.

# 7.0 Changes to this Privacy Policy

This Privacy Policy is effective as of October 10, 2023 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our Platform.

# 8.0 Contact Us

If you have any questions, concerns, or requests related to this Privacy and Cookie Policy, please contact us at:

ICBN 6013 Wesley Grove Blvd. Building #2, Suite #207-A Wesley Chapel, Florida 33544 Phone: 888-341-4314

Email: agentsupport@myicbn.com

By using this Platform, you acknowledge that you have read, understood, and agreed to this Privacy and Cookie Policy.