

Privacy Policy



This Privacy Notice describes the information collection, use, and disclosure practices with respect to Ash Brokerage, LLC (“we,” “us,” “our,” or the “Company”) and its website, ashbrokerage.com, and any other websites or platforms that the Company may create in the future (the “Platform”).

The purpose of the Platform is to provide information and tools to licensed insurance agents and prospective insurance agents (“Agents”). We also receive information about individuals who are interested in insurance or financial products (“Consumers”) and make such information available to licensed insurance agents who assist individuals with the purchase of the products. We may also work with “Lead Vendors” – companies that collect inquiries from Consumers and pass such inquiries to Agents and Company representatives. Lead Vendors must obtain appropriate consent from Consumers to be contacted regarding specific products before providing us with such Consumers’ information.

This Privacy Notice uses the term “Personal Information” to describe information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Applicability of HIPAA and GLBA

Since we facilitate the sale of a diverse range of insurance products, our 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.

Specifically, we act as a Business Associate (as defined by HIPAA) if 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). In our role 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 or financial 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 Notice applies to personal information that is not covered by HIPAA or GLBA.

Personal Information We Collect and Sources of Personal Information

The table below details the categories of Personal Information that we may collect or obtain through the operation of the Platform. In addition to the sources listed below, we may collect this information from third-party service providers or vendors, including data analytics providers.

CATEGORY	EXAMPLES AND SOURCES
Contact Information	Consumers’ and Agents’ name, phone number, and email address, as well as Consumers’ postal address. We may collect this information about Consumers from Lead Vendors, Agents, insurance carriers, data brokers, and agencies. We collect this information about Agents from Agents or marketing organizations in the Agents’ product sale hierarchy.
Login Credentials	This includes username and password* when Agents or Consumers choose to create an account with us.
Identification Information*	Agents’ National Producer Number and Social Security Number. We collect this information from Agents when they begin working with us. Consumers’ driver’s license, Social Security, and/or similar government-issued identification numbers. We collect this information about Consumers provided in the course of discussions with an Agent or representative, which is relevant to the processing of an application for an insurance or financial product.
Demographic Information*	Consumers’ age, date of birth, marital status, language preference, ethnicity, race, and sex or gender. We collect this information about Consumers when Lead Vendors, insurance carriers, Agents, data brokers, or agencies provide it to us.
Health Information*	Consumers’ health information provided in the course of discussions with an Agent or representative, which is relevant to the processing of an application for an insurance or financial product. For example, notes about a Consumer may state that the Consumer has diabetes, as is relevant for an application for a life insurance product.

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CATEGORY	EXAMPLES AND SOURCES
Sensory Information	Audio recordings of Consumer conversations with representatives and Agents in connection with inquiries regarding insurance and/or financial products. We may also have access to video snippets of user website activity evidencing consent to be contacted. This information is collected from Lead Vendors, Agents, insurance carriers, and agencies.
Commercial Information	We collect information about the products requested by Consumers, including information entered into insurance and/or financial product applications, as provided by you, a Lead Vendor, Agent, data brokers, insurance carriers, advertising and/or social media networks, or an agency. We also collect information regarding your purchase of insurance and/or financial products, including the type of product purchased and the corresponding carrier.
Internet or Other Similar Network Activity	Automatically collected information on users' interaction with the Platform. This may include your browsing history (including the site you came from before visiting our website and the site you went to after leaving our website), duration of browsing session, device ID, and IP address. We may also collect this information from advertising networks.
Geolocation Data	We collect geolocation, which may include precise geolocation,* from users. We automatically collect this information from you and may also collect this from advertising networks.
Educational and Professional Information	We collect from data brokers Personal Information about Consumers' educational background, profession, income, product preference, consumer behavior, and asset ownership. This information is used for offline marketing. We also collect this information from Agents when they begin working with us.

Some or all of the types of Personal Information marked with an asterisk (*) may be considered "sensitive" personal information according to some state laws.

We may also partner with financial processors or payment vendors to provide services to Agents on the Platform.

We do not collect biometric information.

Your information may be provided to us by your spouse or other family member.

How We Use the Personal Information We Collect

We may use or disclose the Personal Information that we collect for one or more of the following purposes:

- Operate the Platform;
- Communicate with you regarding the Platform;
- Contact Consumers through our employed agents regarding insurance and/or financial products in which the Consumer expressed interest;
- Address users' and Consumers' inquiries;
- Process transactions;
- Tailor the content and information that we may send or display to you;
- Analyze use of our products and services;
- Develop new products and services;
- Comply with legal obligations;
- Protect our rights, property, and safety or the rights, property, and safety of others; and
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our customers is among the assets transferred. You hereby consent to such transfers and we may assign and transfer all of the rights, benefits, duties, and obligations of this Privacy Notice, under the circumstances described in this paragraph.

From time to time, we may contact users via email and mail, for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. If you would like to stop receiving marketing or promotional communications via email or mail from us, you may opt-out of such communications by contacting us at the toll-free number or email address listed below.

We may also contact Agents, Consumers, and other users via text messaging, but only if such individuals opt-in to receive text messages and only within the scope of such consent.

How We Share the Personal Information We Collect

We may disclose all categories of Personal Information described above in “Personal Information We Collect” to the third parties listed below for the purpose of facilitating the sale of insurance and/or financial products to individuals who are interested in purchasing such products.

- **With Our Service Providers.** We may share Personal Information about Consumers and Agents with third parties who perform services for us or on our behalf. For example, this may include payment processors and companies that send emails on our behalf or other operating systems or platforms that help us run our services.
- **With Our Business Partners.** This includes our affiliates in the insurance or financial industry, insurance carriers, and any other entities that are involved in the sale of insurance or financial products such as marketing organizations that specialize in the insurance or financial industry.
- **With Law Enforcement, Government Agencies, or Parties to a Legal Proceeding.** We may share Personal Information with such entities to comply with the law or assist in law enforcement.
- **With Our Independent Agents and Advisors.** Agents and advisors have access to the Personal Information about Consumers that is provided by the Consumers when requesting information regarding insurance and/or financial products.
- **With Data Analytics Providers and Advertising Service Providers.** Third-party data analytics providers may collect Personal Information about users over time and across different websites, applications, and devices for the purposes of targeted advertising. These providers may collect Personal Information, specifically Internet or other similar network activity information, your input on the website, social media information, and/or commercial information in this manner on our Platform. For more information on these third parties, please see the below “Cookie Policy.”

We may partner with these third parties to tailor and customize our advertising to Users. The practice of targeted advertising may be considered a “sale” of Personal Information under some state laws. For more information about your choices related to this practice, please see “Your State Privacy Rights” on legal.ashbrokerage.com.

Retention of Data

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data;
- Whether the data is necessary to provide our Platform; and
- Whether our Consumers or Agents would reasonably expect that we would retain the data until they remove it or until their accounts are closed or terminated.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and cease any further processing until deletion is possible. For your full list of rights and state requirements regarding your personal information, visit legal.ashbrokerage.com.

Data Security

No security is foolproof, and the Internet is an insecure medium. We cannot guarantee absolute security, but we work hard to protect our Company and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information that we collect and store.

Contact Information

If you have any questions or comments about this notice, or the ways in which we collect and use your personal information, please do not hesitate to contact us at (800) 589-3000, legal@ashbrokerage.com or by mail at:

Ash Brokerage, LLC
Attn: Chief Compliance Officer
888 South Harrison Street, Suite 900
Fort Wayne, IN 46802

**We may revise our privacy practices from time to time. We will give you a revised notice if required by law. By continuing to access or use the Platform after those changes become effective, you acknowledge the revised Privacy Notice.*

**Our privacy practices comply with all applicable laws. If a state's privacy laws are more restrictive than those stated in this notice, we comply with those laws.*

**Your agent, consultant or advisor may have a different privacy policy.*