



Website Privacy Notice

1. Introduction

This Privacy Notice explains how ANV Global Services Inc., operating within the United States collect, use, disclose, maintain and protect Personal Information when a user (“user” or “you”) uses or accesses our website ([Home | ANV](#)) (the “Site”) which may be in connection with the administration of insurance policies and other services that we may provide you in the course of our relationship with you (“Services”).

As you review this Notice, please keep in mind the following:

- If you are a U.S. consumer and have a financial product or service with us, we will use and share any information that we collect from or about you in accordance with our U.S. Consumer Privacy Notice, which offers you certain choices with respect to the use and sharing of your personal information.
- If you are a California resident, you may have rights under the California Consumer Privacy Act. Learn more about your CCPA rights.

We may change the provisions of this Notice at any time and for any reason in our sole and absolute discretion and will indicate when changes have been made by revising the date at the top of this Notice and on this website. All changes are effective immediately when posted. Your use of the Site is your express consent to the terms and conditions of this Notice, and continued use following the posting of such changes shall constitute your consent to such changes. We encourage you to review this Notice whenever you access the Site to see if it has changed and make sure that you understand the most current information about your privacy.

This Notice does not apply to any activity on third-party websites and mobile applications that may link to our websites. Our websites may contain links to other websites or platforms; those websites operate independently from us, and their privacy practices are subject to their own privacy policy or policies, which we strongly encourage you to review to understand their procedures for collecting, using and disclosing Personal Information. We are not responsible for the content of the linked websites, any use of these websites, or the privacy practices of these websites. We do not control third-party websites and applications and are not responsible for their actions or privacy practices.

ANV is committed to protecting the privacy of the Personal Information of individuals we collect in conducting our business, as well as any Payment Card Information and Protected Health Information (as those terms are defined below). Our goal is to provide excellent service while meeting our commitment to keep your Personal Information safe and secure. The safeguards we use to protect your Personal Information are described below.

- **“Personal Information”** is information that identifies or relates to you, or is capable, either itself or in combination with other information, of identifying an individual.
- **“Payment Card Information”** (or “PCI”) includes a credit card number, expiration date and security code.



- **“Protected Health Information”** (“PHI”) as defined by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).

2. What information does ANV collect?

ANV collects information: (1) you provide when you use or access the Site or in connection with the Services; (2) automatically through your use or access to the Site; and (3) from third parties in connection with your use of the Site and in providing Services to you.

2.1) Information that you provide

ANV may collect information that you provide when you use or access the Site. This information collection may occur, for example, when you: (a) submit an application, quote, or a claim or fill out any forms on the Site; (b) create an online account or register to use the Services; (c) make a payment related to your insurance policy; (d) send questions or comments via email, text messaging or live chat to customer support; (e) fill out online surveys; and (f) otherwise communicate or interact with us through the Site.

The types of information that you provide may include:

- Your name, postal address, email address, telephone number, date of birth, marital status, gender, government identification numbers (such as Social Security number and driver’s license number), financial account number, PCI, and other contact or identifying information.
- Information which is relevant to your insurance policy, including details of previous insurance policies and claims history;
- Information relevant to any claim or complaint you may make;
- Other personal information required for us to provide the Services that you have requested.

2.2) Information we collect automatically

When you interact with our Site, we may collect technical information associated with the device you use, such as the type and model, system language, browser type, geographical location and operating system, your Internet protocol (IP) address, IDFA (identifier for advertisers) and other unique identifiers. We may also process information about what you do on our Site, such as how long you visit, what links you click on, what pages you visit, how many times you visit a page and how long it takes for you to come back.

We may utilize tools provided by third parties on our Site to help us understand how users access and use the Site, such as Google Analytics. These tools may automatically collect information similar to the “Information we collect automatically” outlined above. You can opt-out of collection by Google Analytics by visiting: <https://tools.google.com/dlpage/gaoptout/>.

To collect these types of information, we may use the technologies, including those identified below:

- **Browser Cookies:** Cookies are small data files stored on your device by a website. Among other things, cookies help us improve your experience on the Site to see which areas and

features of our Site are popular, ultimately improving the Services offered to you. In addition, when you view a video on our Site, we may set a cookie on your computer or device. For more information about cookies, and how to disable them, please see “What are your information sharing choices?” below.

- **Storage Cookies:** Certain features of our websites may use locally stored objects (storage cookies) to collect and store information about your preferences and navigation to, from and on this website. Such cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons:** Pages of our website and our emails may contain small electronic files known as web beacons (also referred to as web bugs, clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to monitor user behaviour, deliver cookies, collect information, count visits, understand usage and campaign effectiveness, to tell if a recipient has opened and acted upon an email and verifying system and server integrity.
- **Log Files:** Log files record website activity on our Services and enable us to gather statistics about our users' browsing habits. These entries help ANV determine, among other things, how many and how often users have accessed or used our Services, which pages of our Services they've visited, and other similar data.

There may be other technologies now and later devised and used by us in connection with the Services provided to you. We may associate the information we collect from these technologies with other information, including Personal Information that you provide for the purposes described in this Notice.

2.3) Information we collect from third parties

We also may collect or receive information from third party partners who provide services or data to us.

3. How does ANV use the information it collects?

We may use the information including Personal Information that we collect or you provide as described in this Notice for the following purposes:

- Provide and deliver the Services you request, process transactions, and to send you related information, including expiration and renewal notices, confirmations and invoices;
- Present this Site and its contents to you;
- Monitor and evaluate trends, usage and activities in connection with our Site and the Services;
- Improve the Site, Services and overall customer experience;
- Provide you with quotes for requested insurance products;
- Monitor performance and usage of the Services, identify problem areas with the Services, and inform design development and updates;
- Send you advertising or promotional materials, including information about new products, contests, features and enhancements, special offers and other events of interest from ANV and our select partners;



- For analytics and modelling purposes to facilitate the Services offered to you;
- Respond to your comments, questions and requests;
- Carry out our obligations and enforce our rights arising from any contracts or other binding engagement entered into between you and us, including for billing and collection;
- Comply with legal obligations or legal process;
- Monitor for and protect against or prevent fraud or other unauthorized or illegal activity;
- Protect the security and integrity of our business and the Services, for enforcement of our agreement with you, and our compliance with our applicable law.
- Notify you about changes to this Site or any products or Services offered;
- Allow you to participate in interactive features on this website; and
- In any other way we may describe when you provide the information or with your consent.

ANV may store and process Personal Information in the United States and other countries, including but not limited to the United Kingdom, Italy, Germany, and Bermuda.

4. With whom does ANV share your information?

We may share your information that we collect from and about you described in this Notice with our affiliates, subsidiaries and other third parties as described below. In particular, we may share your information with:

- Third party vendors, consultants and other service providers who are working on our behalf to provide the Site and Services;
- Third party sites that provide relevant information not found on our Site such as training and informational materials, that facilitate online commerce, capture data for ANV such as career applications, and allow you to interact with other websites and/or applications in which you may have accounts (such as Facebook and other social media sites);
- Other entities to protect the rights, safety and property of ANV, our employees, agents, users and other third parties; to enforce our agreements, policies and Terms of Use; to protect against fraudulent, abusive, inappropriate, or unlawful use of the Site, our Services;
- Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of ANV's businesses;
- Governmental authorities and third parties to comply with legal requirements, such as, demands, subpoenas, court orders, and other legal processes; and
- To any entity and for any other purpose disclosed by us when you provide the information or to any ANV or other entity with your consent.

We may also disclose aggregated information about our users, and information that does not identify any individual, without restriction.

5. What are your information sharing choices?

We strive to provide you with choices regarding the Personal Information you provide. The following mechanisms are available:

5.1 Regarding Personal Information

Any user of the Service may review and/or update your contact information on file or inform us that you want to remove your information from our database emailing us at privacy@anv.eu.com. Please be sure to include in your message, the name of the website or mobile application at which you registered and the email address you used to register so that we can verify your request. We will acknowledge all access requests as soon as reasonably practicable, and in any event within thirty (30) days. In most cases we cannot delete your Personal Information except by also deleting your user account. We may not accommodate a request to change or delete information if we believe the change would violate any law or legal requirement, cause the information to be incorrect or if we have other legitimate grounds or requirements to retain the data.

5.2 Regarding Cookies and Other Collection Technologies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Removing or rejecting browser cookies does not necessarily affect third party cookies used in connection with our Services. For more information about how to delete or disable cookies, please visit <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies> or www.adobe.com/products/flashplayer/security. Note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

5.3 Regarding Promotional Communications

You may opt out of receiving promotional emails, text messages or mail from ANV by declining to receive such communications at the time of registration or at the time you otherwise provide the information to ANV. You may also opt-out of receiving promotional emails or text messages by following the instructions in those emails or text messages or by contacting us. Finally, you may opt-out of ANV sharing your data with affiliates for marketing purposes. If you opt out, we may still send you transactional or relationship messages, such as emails about your account or our ongoing business relations, for furtherance of any legitimate business purpose.

5.4 Privacy Rights in Certain Jurisdictions

Certain jurisdictions extend enhanced Personal Information rights to residents of or persons located in the jurisdiction. You may have some or all of the following rights in relation to the Personal Information we collect about or from you, depending on the jurisdiction and our reason for processing your information: rights to access, correct, delete, restrict/limit processing, data portability, withdraw consent, opt in or out of the sale or sharing of Personal Information for cross-contextual advertising, and/or the right to non-discrimination. To exercise your rights, please:

- Email privacy@anv.eu.com with the subject line “Data Rights Request”; or



We will need to verify your identity before processing most requests, which may require us to obtain additional Personal Information from you. Please provide your name, email address and mailing address in the original request, as well as an explanation of the rights you wish to exercise. We will only use the Personal Information provided via the foregoing to review and comply with the request. If you do not provide this information, we may not be able to verify or complete your request in all circumstances.

If you wish to submit a verifiable consumer request on behalf of another individual, such as a minor child, we will also need sufficient information to verify that the individual is the person about whom we collected personal information and that you are authorized to submit the request on their behalf.

In certain circumstances, such as for legitimate organizational interests or a valid legal requirement, we may decline a request to exercise the rights described above. If you would like to appeal a decision, you may email us with “Appeal Privacy Rights Request Decision” in the subject, explain the request and we will review your appeal.

Making a verifiable consumer request does not require you to create an account with us.

6. How does ANV safeguard your Personal Information?

ANV maintains reasonable and appropriate security measures designed to protect your Personal Information. We take the security of Personal Information seriously. ANV has established reasonable technical, physical, legal and organizational measures which are consistent with applicable privacy and data security laws and our organizational requirements.

The safety and security of your information also depends on you. If you choose, or are provided with, a username, password or any other piece of information, as part of our security procedures you must treat such information as confidential and must not disclose it to any other person or entity. You also acknowledge that your account is established for a specific person or entity, and you agree not to provide any unauthorized person with access to the Services. You agree to notify us immediately of any unauthorized access to or use of your username or password or any other breach of security.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee security. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures. While we seek to keep information safe and secure, we cannot and do not guarantee that personal information you provide to us will be secure, or that the Services will be uninterrupted or error-free.

7. How can you contact us?

If you have any questions, comments or concerns with respect to our privacy practices or this Notice, or wish to update your information, please feel free to contact us at privacy@anv.eu.com or you may also write to us at the following address:

ANV Global Services Inc
10 Madison Ave, 3rd Floor
Morristown, NJ, 07960



United States

8. Children under the age of thirteen

ANV’s websites and the Services are not intended for children under thirteen (13) years of age. No one under the age of thirteen (13) may provide any Personal Information to ANV in connection or in association with the Services. We do not knowingly collect Personal Information from children under thirteen (13).

9. California Privacy Addendum

This Notice further explains how we collect, use, disclose and otherwise process Personal Information, either online or offline, of individual residents of the State of California. Terms used but not defined under this section shall have the meaning ascribed to them in the California Consumer Privacy Act of 2018 (“CCPA”). For California consumers, the provisions of this section prevail over any conflicting provisions in other sections of Notice.

In the last 12 months we have collected and disclosed for a business purpose the following categories of personal information:

Category	Examples
A. Identifiers	Identifiers such as name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
B. Information under the California Customer Records statute	Personal information described in subdivision (e) of Section 1798.80 (California Customer Records statute) such as name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Characteristics of protected classifications	Such as age, race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex.
D. Commercial information	Commercial information, such as records of personal property, services purchased, obtained, or considered.
E. Commercial information	Internet or other electronic network activity information, such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

F. Sensory data	Such as such as recordings of phone calls between you and us, where permitted by law.
G. Inferences drawn from other personal information.	Such as predictions about your interests and preferences and insights we receive from third parties.
H. Sensitive personal information	Such as a consumer's Social Security number, driver's license number, state identification number, or passport number, precise geolocation, biometric information (for the purposes of uniquely identifying a consumer), personal health information, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account financial account.

Please see the following sections to learn about the types of information we collection, how we collect the information, how we use the information and share the information in the last 12 months: “What information does ANV collect?”; “How does ANV use the information it collects?”; “With whom does ANV share your information?”

9.1 Your California Rights

As a California resident, you may be able to exercise the following rights in relation to the Personal Information about you that we have collected (subject to certain limitations at law):

9.1.1 Right to Access/Know

California residents have the right to request the following information relating to the Personal Information we have collected about you and disclosed in the last 12 months:

- The categories and the specific pieces of Personal Information we have collected about you;
- The categories of sources for the Personal Information we have collected about you;
- Our business or commercial purpose for collecting, selling, or sharing that Personal Information;
- The categories of third parties with whom we share the Personal Information;
- The categories of Personal Information we have disclosed for a business purpose and the categories of recipients; and
- The categories of Personal Information we have sold and the categories of purchasers.

9.1.2 Right to Correct Inaccurate Personal Information

California residents have the right to request a business that maintains inaccurate Personal Information about the consumer correct such in accurate personal information, subject to the nature of the Personal Information and purposes of the processing the personal information.

9.1.3 Right to Request Deletion

California residents have the right to request the deletion or erasure of Personal Information we have collected from you, subject to certain exceptions.

9.1.4. Right to Opt-out of Sale or the Sharing of California Personal Information

ANV does not sell Personal Information nor has it sold Personal Information in the past 12 months.

9.1.5 Right to Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services;
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of services; or
- Suggest that you may receive a different price or rate for services or a different level or quality of services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

9.1.6 How To Exercise Your California Privacy Rights

To exercise your rights please submit a request by:

- Emailing privacy@anv.eu.com with the subject line "California Rights Request"; or

Verification. As required under applicable law, we may take steps to verify your identity before processing your request(s), which may require us to obtain additional Personal Information from you. You must provide us with enough information to allow us to reasonably verify you are the person about whom we collected California Personal Information, or an authorized representative, (such as name, email address and mailing address) and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will only use the Personal Information provided in connection with a California Rights Request to review and comply with the request. If you do not provide this information, we may not be able to verify or complete your request in all circumstances.

In certain circumstances, we may decline a request to exercise the rights described above. Making a verifiable consumer request does not require you to create an account with us.

We do not charge a fee to process or respond to your verifiable consumer request unless it is



excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

9.1.7 California’s “Shine the Light” Law

California’s “Shine the Light” law (Civil Code § 1798.83) permits California residents that have an established business relationship with us to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes during the immediately preceding calendar year or to have the right to opt-out of such disclosures.

10. Notice to persons accessing this website outside the United States

If you reside outside the United States, any information you provide to us through this website or the Services may be transferred out of your country and into the U.S. If you do not want your Personal Information, to leave your country, do not provide the information to us. To see what we offer in the EU, please visit [Home | ANV](#). Personal Information collected on this Site and through the Services may be stored and processed in the U.S. or any other country in which we or service providers maintain facilities.

If you have any comments or concerns regarding this notice, please contact privacy@anv.eu.com