

# Privacy Notice



**Initial Privacy Notice Of  
Shepherd & Associates Insurance Services, Inc.  
1263 San Mateo Drive  
Menlo Park, CA 94025**

## **Purpose of this initial privacy notice**

The purpose of this notice is to inform you of Shepherd & Associates (“S&A”) privacy policies and procedures. We protect your nonpublic personal information (“NPI”) from disclosures which are not allowed by law, restricted or disallowed in this Initial Privacy Notice. Shepherd & Associates gives this Notice which complies with the requirements of the law, as a service to all valued customers.

This Initial Privacy Notice describes how Shepherd & Associates collects, discloses and protects your personal information we collect. We may materially change our privacy policies and procedures at any time. If we do make a change, we will notify you before we make the changes.



## **Our Privacy Policies and Procedures**

### **1. Categories of NPI we collect and may disclose.**

We collect several types of NPI about you that insurance carriers and related companies require. The NPI is used to properly underwrite insurance you might purchase. We collect information from 1) applications, 2) forms and 3) telephone or in-person interviews. Collected information may include:

- a. Medical Information
- b. Personal Information
- c. Driving Records
- d. Financial Information
- e. Social Security Numbers
- f. Date of Birth
- g. Salary Information
- h. Home Address
- i. Stock and Company Ownership
- j. Claim Information/Loss History and Related Information
- k. Client Strategic Information

### **2. Categories of Affiliates and Nonaffiliated Third Parties to Whom we Disclose NPI**

Insurance Carriers and related entities could include the following:

1. Medical Insurance Companies
2. Dental Insurance Companies
3. Vision Insurance Companies
4. Life Insurance Companies
5. Disability Insurance Carriers
6. Fire and Casualty Carriers
7. Third Party Claims Administrators
8. Managing General underwriters
9. Insurance Brokers and Consultants
10. General Agents
11. Program Administrators



### **3. Opting Out of Disclosure to Nonaffiliated Third Parties**

The law allows you to “opt-out” of only certain kinds of information sharing with third parties. S&A does not share personal information about you or your clients with any third parties that triggers this opt-out option.

***YOU ARE ALREADY OPTED OUT AND DO NOT NEED TO TAKE ANY FURTHER ACTION.***

We may disclose nonpublic personal information about you or your clients to insurance carriers. Such information could include 1) underwriting, 2) claims and 3) marketing affiliates. Information is shared only to complete the business transaction.

We may disclose nonpublic personal information to nonaffiliated third parties as permitted or required by law.

### **4. Disclosures Made of NPFI Protected by the Federal Fair Credit Reporting Act.**

The law allows us to share non-transactional information you disclosed under the Fair Credit Reporting Act. However, we do not share this information.

### **5. Confidentiality and Security of NPI**

We protect and safeguard your NPI through the following security measures:

- a. Files stored on the second floor of a residence
- b. All files are put away at night
- c. During office hours, only S&A employees are allowed in the upstairs office.
- d. Any client, vendor or visitor is escorted by an S&A employee.

Please request to see our Privacy Policies and Procedures Manual for further information.

### **6. You're Right to your NPI.**

You have the right to 1) access, 2) copy, 3) review and 4) request correction of any NPI we possess. This request must be in writing. We have 45 days to allow you to review your NPI. If you believe that there is an error in the information, you may request that it be corrected. This request must be written. Once received, we have 45 days to make the correction. If we disagree with your request, we will inform you why we will not make the change. If you disagree, you may supply us with a concise statement as to why you disagree. It will be filed with your NPI.



## **7. Allowed or Required Disclosure of NPI Under Specific Exceptions.**

The law allows us to disclose NPI in the following situations. You may not prevent our disclosure of your NPI as authorization by law.

- a) With your written authorization
- b) To a non-insurance entity if it is reasonably necessary for us to properly do our business and the other entity agrees not to disclose the NPI.
- c) To an insurance entity if the disclosure helps the receiving parties perform an insurance transaction for you. Or if it is reasonably necessary to detect or prevent criminal activity, fraud or misrepresentation regarding an insurance transaction.
- d) To a medical professional in order to:
  - 1. Verify coverage or benefits, conduct operations or service audits; or
  - 2. Inform a person of a medical problem they might not be aware of.
- e) To the Department of Insurance, law enforcement or other governmental entity including an administrative or court order. Or as is otherwise required or permitted by law.
- f) To conduct actuarial or research studies if there are proper safeguards.
- g) To facilitate the sale of whole or part of an insurance business.
- h) To a wholly owned affiliate whose only use will be for marketing a financial product or service provided that
  - 1. No medical or character information may be disclosed
  - 2. The recipient agrees to use it only for the purpose for the intended purpose.
- i) To a nonaffiliated third party for the marketing of a joint financial product or service with us provided that:
  - 1. The information can only be used by the nonaffiliated for marketing our joint financial product.
  - 2. You were given the opportunity to opt-out and have not done so.
  - 3. No medical information is disclosed.
- j) By a consumer reporting agency if the information does not go to an entity.
- k) To a group policyholder to 1) report claims experience or 2) do an audit or 3) to a certificate holder or 4) policyholder to inform them of the status of an insurance transaction.
- l) To a professional peer review organization to review medical care.
- m) To the government to determine health benefit eligibility.
- n) To a lien holder, etc. or any other having a legal interest in an insurance policy to the extent the disclosure is needed to protect their interest.