NSD PRIVACY POLICY

Document Title	NSD Privacy Policy
Document ID	NSD-060
Document Purpose	The purpose of our privacy policy is to inform individuals (such as customers, employees, or website users) about how Nation Safe Drivers (NSD) collects, uses, discloses, stores, and protects their personal data. It serves as a transparent communication tool that helps build trust and demonstrates the organization's commitment to protecting individuals' privacy rights and complying with relevant privacy laws and regulations.
Document Scope	This policy applies to all NSD employees and third-party consultants and contractors (collectively referred to as 'staff'), under a legal agreement, and entrusted with NSD information.
Document Owners	Stephanie Pearle, Blake Nielson, Donna Vazquez
Document Effective Date	7/15/2025
Document Version	3
Document Approvals	Stephanie Pearle
	Notify All C-Suite Members
Next Periodic Review Date	07/15/2026
Notes	

TABLE OF CONTENTS

Overview 3

Purpose 3

Scope 3

Information NSD Collects 4

How NSD Collect Personal Information 4

- Active Collection 4
- Passive Collection 5
- Information Collected by "Cookies" And Other Tracking Techniques 5
- Platform Information 5
- Collecting Personal Information from Children 5

NSD's Use of Personal Information 6

How and When NSD Shares Your Personal Information 6

- How NSD Uses Cookies 7

NSD's Past Disclosures of Personal Information for a Business Purpose 7
How NSD Protects Your Personal Information 7
How NSD Communicates with You 7
Right to Data Portability 8
Right to Request Deletion of Personal Information 8
Exercising Your Access, Data Portability, and Deletion Rights 9
Response Timing and Format 9
Non-Discrimination 10
Third-Party Websites 10
Law Applicable to this Privacy Policy 10
Changes to Our Privacy Policy 10
Contacting NSD 11
Policy 11
Responsibility 12
Enforcement 12
Definitions 12
Appendix A-1: Applicability to Other U.S. States 13
Appendix A: Applicability to California Only 13
Rights under California's Shine the Light Law 13
Special Information for California Residents 13
Right of Access to Specific Information 13
Appendix B: PII Protection 14
Data Storage 14
Data Use 14
Data Transmission 14
Data Accuracy 15
Disclosing Data for Other Reasons 15
Revision History 15

OVERVIEW

Nation Motor Club, LLC d/b/a Nation Safe Drivers, NIU of Florida, Inc., National Adjustment Bureau, LLC, Nation Safe Drivers Services, Inc, and National Insurance Underwriters, LLC (collectively, "NSD") values the trust that our clients and business partners put in us to safeguard your Personal Information.

We know that you care about your Personal Information, and we want you to be informed about our practices. This Privacy Policy explains how we collect, use, disclose, and protect your Personal Information. Please review this Privacy Policy, as it contains information, terms, and conditions that may affect your legal rights, as well as your ability to use our websites, including www.nationsafedrivers.com (collectively, "the Site").

PURPOSE

The purpose of Nation Safe Drivers' Privacy Policy is to inform individuals (such as customers, employees, or website users) about how NSD collects, uses, discloses, stores, and protects their personal data. It serves as a transparent communication tool that helps build trust and demonstrates the organization's commitment to protecting individuals' privacy rights and complying with relevant privacy laws and regulations.

SCOPE

A Stand-Alone Document?	Typical Viewing Audience	Staff Signature required?	Typical review cadence
Yes	All Employees (and Contractors, if applicable)	No	Annually

This policy applies to all NSD employees and third-party consultants and contractors (collectively referred to as 'staff'), under a legal agreement, and entrusted with NSD information.

This policy applies to all public, non-public, restricted, and confidential data that NSD holds which always includes data that can be used to identify an individual. This can include, but is not limited to:

1. Personal information of staff
2. Names of app users
3. Postal addresses
4. Email addresses
5. Telephone numbers
6. Social Security numbers (SSN)

INFORMATION NSD COLLECTS

Category	Examples
Identifiers	A real name, alias, 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.
Personal information categories	A 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, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. *Please note that some Personal Information included in this category may overlap with other categories.
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Geolocation data	Physical location or movements.

NSD collects information that identifies, relates to, describes, references, is capable of being associated with, or could be linked, directly or indirectly, with a particular consumer or device ("Personal Information").

The following table identifies the categories of Personal Information NSD collects or has collected within the last twelve (12) months. NSD will not collect additional categories of Personal Information without providing you notice.

HOW NSD COLLECT PERSONAL INFORMATION

NSD may collect Personal Information falling into one of the above-listed categories actively or passively.

ACTIVE COLLECTION

NSD may collect information directly from you. For example, we may collect Personal Information from you when you:

1. Enroll in a program or purchase a service directly from NSD

2. Make a claim that NSD services and processes
3. Create an account on the Site.
4. Participate in optional surveys.
5. Correspond with us through message boards, chat sessions, email, messages delivered via a portal accessed on the Site, telephone conversations, and letters of correspondence.

We may also collect information from you from the following categories of third parties:

1. Business partners from whom you purchase a benefit or service provided by NSD.
2. Business partners who enroll you in program or service provided by NSD.
3. Business partners and insurers on whose behalf NSD processes claims.

PASSIVE COLLECTION

When accessing, browsing, or using the Site, our software may automatically collect certain information from your device (e.g., computer, smartphone, and tablet) using "cookies" and other tracking techniques, or by collecting platform information from our servers.

INFORMATION COLLECTED BY "COOKIES" AND OTHER TRACKING TECHNIQUES

NSD, as well as our vendors or business partners, may use various technologies, such as cookies and web beacons, to collect information about you when you access, browse, or use the Site. For additional information, including how to block cookies, please see "NSD's Use of Personal Information" below. You may still use the Site if you reject, block, and/or delete our vendors' or our cookies, but please note that you may not be able to access some areas or features of the Site.

NSD may use third-party services, such as Google Analytics, to provide Site-usage analytics. Such third-party services may use cookies, web beacons, and/or other technologies to collect information about your use of the Site. Such information may include your device's Internet Protocol address, browser name and version, pages visited, time spent viewing each page, links clicked, and other information about your visit to and use of the Site. Such analytics may help us track usage of the Site, identify popular features, provide advertising and other content specific to your use of the Site and other websites, and better understand the online activity of our website visitors. If you wish to block, erase, or be warned of cookies used for analytic purposes, please refer to your browser's instructions or help screen to learn about these functions.

PLATFORM INFORMATION

When you visit the Site, our servers automatically record certain information about the device (e.g., a computer or mobile device) you used to access the Site. Such information, often referred to as "log file" information, may include your device's Internet Protocol address, operating system name and version, and browser name and version, as well as the referring URL, number of times your device has accessed the Site, pages of the Site you viewed, links you clicked, and other information about your visit to and use of the Site.

COLLECTING PERSONAL INFORMATION FROM CHILDREN

Because NSD is committed to protecting the privacy of children, the Site is not intended for use by or directed at children under the age of 16. We do not knowingly collect, via the Site or otherwise, Personal Information from anyone under 16 years of age. We encourage parents and guardians to take an active role in their children's online and mobile activities and interests.

NSD'S USE OF PERSONAL INFORMATION

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

1. To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that Personal Information to respond to your inquiry. Similarly, if you provide your Personal Information to purchase a product or service, we will use that information to process your payment.
2. To provide, support, personalize, and improve and enhance the user experience while navigating our Site.
3. To process a claim you make.
4. To provide you with a benefit or service to which you are entitled.
5. To provide, develop, evaluate, and improve our products and services.
6. To create, maintain, customize, and secure your account with us.
7. To process your requests, transactions, and payments, and to prevent transactional fraud.
8. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
9. To deliver content, information, and product or service offerings relevant to your interests, including targeted offers and ads through our Site, third-party sites, and via email or text message (with your consent, where required by law).
10. To help maintain the safety, security, and integrity of our Site, products and services, databases and other technology assets, and business.
11. For testing, research, analysis, and product development, including to develop and improve our Site, products, and services.
12. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

HOW AND WHEN NSD SHARES YOUR PERSONAL INFORMATION

NSD does not and will not sell your Personal Information. NSD may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we take reasonable steps to ensure that our business partners and service providers who receive your Personal Information protect it. As needed, and where and when required by law, NSD will enter a contract that describes the purpose for which the business partner or service provides can use your Personal Information and requires the recipient to keep your Personal Information confidential and not use it for any purpose except performing the purpose described in the contract.

We share your Personal Information for business purposes with the following categories of third parties:

1. Service providers.
2. Insurers on behalf of whom we provide claim processing.
3. Banks or financial service providers, if necessary to provide you with a benefit or process a transaction.
4. Entities which have agreed to pay NSD to administer a service or benefit to you on their behalf.

Users may manage their cookie preferences and opt-out of non-essential cookies using the cookie settings link available on the Site.

HOW NSD USES COOKIES

NSD, and some of our business partners or service providers, may use cookies to help us count how you access, browse, and use the Site (i.e., by counting the number of times you and other users visit a webpage or access a feature), thereby providing us with information we can use to improve the Site. Cookies are small data files locally stored on the device used to access the Site (e.g., computer, smartphone, tablet). Web beacons are electronic images that we or our vendors may use in the Site or in emails to deliver cookies, count visits, understand Site usage, and/or evaluate the effectiveness of marketing campaigns.

NSD and our business partners/service providers may use one or more of the above- described cookies to facilitate access to various features of the Site.

NSD'S PAST DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

In the preceding twelve (12) months, NSD has disclosed to third parties (i.e., our business partners and service providers) the following categories of Personal Information for a business purpose:

1. Identifiers.
2. Personal Information categories
3. Commercial information.
4. Internet or other similar network activity.
5. Geolocation data.

HOW NSD PROTECTS YOUR PERSONAL INFORMATION

While no website or electronic data can ever be completely secure, NSD is committed to maintaining up-to-date and appropriate security measures and safeguards. We maintain a variety of physical, electronic, and procedural safeguards to help prevent unauthorized access to and improper use of your personal information. For example, our employees' computers are password protected, and we provide regular education to our employees regarding our security and privacy practices.

HOW NSD COMMUNICATES WITH YOU

Many of our products and services utilize SMS messaging to update you on the progress of your service or to gain additional information on your service throughout the process. You may opt to not receive text messages by declining the feature when asked by your customer service representative. If you agree to receive SMS messages, we will provide you with an option to respond to an SMS message in manner that will allow you to opt out of receiving future SMS messages. In some instances where we have an existing relationship with you, you may not have previously received an option to opt out. In such circumstances you can always opt out of receiving future texts by contacting us through any of the means described in Section12.

RIGHT TO DATA PORTABILITY

You have the right to request that NSD provide you with the specific pieces of Personal Information we have collected about you. Once we receive and confirm your verifiable consumer request (see Exercising Your Access, Data Portability, and Deletion Rights below), we will provide with your choice of an electronic or physical copy of the specific pieces of Personal Information we have collected from you, provided that such Personal Information has not been anonymized or aggregated in a way we can no longer associate with you.

RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION

You have the right to request that NSD delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Your Access, Data Portability, and Deletion Rights below), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

You may also request the deletion or removal of their Personal Information by contacting the company through which an NSD product or service was purchased and ask such company to send notification to NSD to delete or remove any Personal Information.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the Personal Information, provide a product, service, or benefit that you requested, take actions anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug the Site to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the Electronic Communications Privacy Act of 1986 (ECPA)
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

In the event NSD cannot presently honor a deletion request, NSD will provide an anticipated date that such information will be removed once we have received a request to remove this data. In the event your purchasing outlet has gone out of business, you may elect to have NSD remove information about you directly, but please be advised that the deletion of data may prevent you from being identified and qualified for specific products and services in the future.

EXERCISING YOUR ACCESS, DATA PORTABILITY, AND DELETION RIGHTS

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by any of the following:

1. Calling us at 1-800-338-2680
2. Messaging us online, below: Contact Form
3. Writing to us at:

   Nation Safe Drivers
   5600 Broken Sound Blvd NW
   Boca Raton, FL 33487
   Attention: Compliance Department

Only you, or a person registered with the Florida Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

1. Provide sufficient information that allows us to verify you are the person about whom we collected Personal Information or an authorized representative.
2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

RESPONSE TIMING AND FORMAT

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we may deliver our written response to you via that account or information you provided when you created that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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.

NON-DISCRIMINATION

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

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

THIRD-PARTY WEBSITES

The Site may have links to other websites that NSD does not own, control, or maintain. We cannot be responsible for their privacy policies and practices, and we make no representations or warranties about the privacy practices of those third-party websites. Similarly, we cannot be responsible for the policies and practices of any site from which you linked to our Site. We recommend that you check the privacy policy of other sites and contact the operator if you have concerns or questions.

Please keep in mind that whenever you voluntarily disclose personal information online for example on message boards, through email, or in chat areas, such information can be collected and used by others. In short, if you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

If you are located outside of the United States, please note that your information may be transferred to, stored, and processed in the United States. Where applicable, NSD will comply with local data protection laws.

LAW APPLICABLE TO THIS PRIVACY POLICY

NSD is in the State of Florida, and the Site is intended for users in the United States. Except as otherwise provided, by viewing any content or otherwise accessing the Site, you consent to the transfer of information to the United States to the extent applicable, and the collection, storage, and processing of information under the laws and regulations of the State of Florida and the United States.

CHANGES TO OUR PRIVACY POLICY

NSD reserves the right to amend this Privacy Policy at our discretion and at any time to reflect changes in our privacy practices or relevant laws. The “Last Updated” legend at the top of this Policy indicates when this Policy was last revised. Any changes are effective the latter of when we post the revised policy on the Services or otherwise provide notice of the update as required by law.

When we update this Privacy Policy, we will post the updated notice on the Site and update the notice's effective date. Your continued use of the Site following the posting of changes constitutes your acceptance of such changes.

CONTACTING NSD

If you have any questions or comments about this notice, the ways in which NSD collects and uses your information, your choices, and rights regarding such use, or wish to exercise your rights under Florida law, please do not hesitate to contact us through any of the following:

By phone: 1-800-338-2680

By writing to us at:

Nation Safe Drivers
5600 Broken Sound Blvd NW
Boca Raton, FL 33487
Attention: Compliance Department

POLICY

1. The company will provide training to all staff to help them understand their responsibilities when handling sensitive or confidential data.
2. Staff will keep all data secure by taking sensible precautions and following the guidelines below.
3. Strong passwords must be used and never be shared.
4. Personal data may not be disclosed to unauthorized people, either within NSD or externally.
5. The only people able to access data covered by this policy shall be those who need it for their work duties. For example, PII may be viewed by any staff but may only be shared externally with the entity Policy Owner provided the membership (employer, bank, purchaser) or the member themselves, except in order to comply with our legal requirements.
6. Data shall not be shared informally. When access to confidential information is required, staff can request it from their manager.
7. Data will be regularly reviewed and updated if it is found to be out of date. If no longer required, it will be deleted and disposed of in accordance with the Data Management Policy.
8. Staff may request help from their manager if they are unsure about any aspect of data protection.
9. The organization shall designate a point of contact for use by the customer regarding the processing of PII.
10. When the organization is a PII controller, designate a point of contact for PII principals regarding the processing of their PII.
11. The organization shall appoint a Data Protection Officer (DPO), responsible for developing, implementing, maintaining, and monitoring an organization-wide governance and privacy program, to ensure compliance with all applicable laws and regulations regarding the processing of PII. The DPO shall:
    a. be independent and report directly to the appropriate management level of the organization in order to ensure effective management of privacy risks;
    b. be involved in the management of all issues which relate to the processing of PII;
    c. be expert in data protection legislation, regulation, and practice;
    d. function as a contact point for supervisory authorities;
    e. inform top-level management and employees of the organization of their obligations with respect to the processing of PII;

f. provide advice in respect of privacy impact assessments conducted by the organization.

RESPONSIBILITY

The Chief Information Technology Officer (CITO), Chief Legal Officer (CLO) and the Director of Risk Management have the overall responsibility for data protection at the Company and is the owner of this policy and shall approve subsequent revisions.

Staff are responsible for complying with this and all other Company policies and procedures. Questions regarding this policy can be directed to the policy owners.

ENFORCEMENT

Failure to comply with this policy may result in disciplinary action up to and including termination of employment for employees, or termination of contracts for third parties. Legal action may be taken for violations of applicable regulations and laws.

DEFINITIONS

Terms	Definitions
Personally Identifiable Information or PII	Any data value which can be used to identify an individual natural person such as name, address, geolocation. Some information may need to be combined to identify an individual, such as first name and last name.
Data Subject	The individual whose personal information NSD holds.

APPENDIX A-1: APPLICABILITY TO OTHER U.S. STATES

Residents of Colorado, Connecticut, Virginia, and Utah may have similar rights as those described above under California law, including the rights to access, correct, delete, and opt out of certain processing of their personal information. NSD will honor such rights in accordance with applicable state laws. To exercise these rights, individuals may contact us using the same methods outlined in the Exercising Your Access, Data Portability, and Deletion Rights section.

Colorado residents may also use a Universal Opt-Out Mechanism (UOOM) supported by their browser or device to opt out of targeted advertising or sales of personal data.

APPENDIX A: APPLICABILITY TO CALIFORNIA ONLY

RIGHTS UNDER CALIFORNIA'S SHINE THE LIGHT LAW

NSD will adhere to California Civil Code Section 1798.83 (California's "Shine the Light" law) which requires that all California residents be afforded the option to exercise their choice of whether Personal Information may be shared with third parties for direct marketing purposes or not, as well as to receive information specified in the statute if Personal Information is disclosed to third parties for direct marketing purposes. It permits California residents who use of our Site to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to us via our below contact form, or write us at:

NSD
5600 Broken Sound Blvd NW
Boca Raton, FL 33487
Attn: Compliance Department

SPECIAL INFORMATION FOR CALIFORNIA RESIDENTS

California residents have certain rights under the California Consumer Privacy Act (Cal. Civ. Code § 1798.100-90) ("CCPA"), which are explained below. Please note that the rights described in this section do not apply to Personal Information excluded from the CCPA's scope, such as:

1. Publicly available information from government records
2. De-identified or aggregated consumer information
3. Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data.
4. Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

RIGHT OF ACCESS TO SPECIFIC INFORMATION

As a California resident, you have the right to request that NSD disclose certain information concerning our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request

(See Exercising Your Access, Data Portability, and Deletion Rights below), we will disclose to you:

1. The categories of Personal Information we collected about you.
2. The categories of sources for the Personal Information we collected about you.
3. Our business or commercial purpose for collecting your Personal Information.
4. The categories of third parties with whom we shared your Personal Information.
5. If we disclosed your Personal Information for a business purpose, a list identifying the Personal Information categories that each category of recipient obtained.

APPENDIX B: PII PROTECTION

DATA STORAGE

The following rules describe how and where data shall be safely stored.

When data is stored electronically, it must be protected from unauthorized access, accidental deletion, and malicious hacking attempts:

1. Data must be protected by strong passwords that are changed regularly and never shared between staff.
2. Storage of Confidential data on removable media (such as optical disks or USB thumb drives) is prohibited unless explicitly approved by the Chief Information Technology Officer (CITO).
3. When confidential data is stored on approved removable media (such as backup tapes), these shall be inventoried and securely stored.
4. Data may only be stored on the company network or company-issued devices and may only be uploaded to approved cloud computing services (ex: DocuSign, Pipeline Deals, Azure Storage) which are managed by the company.
5. Servers containing personal data must be sited in a secure location, away from general office space.
6. Data must be backed up frequently and backups will be tested regularly, in line with standard backup procedures.
7. All servers and computers containing data shall be protected by approved security software and a firewall.

DATA USE

Data may only be used for the purpose it is intended. To be useful, data must remain secure and accurate. To prevent the risk of loss, corruption, or theft of data:

1. When working with personal data, staff will ensure the screens of their computers are always locked when left unattended.
2. When sending files with personal data via email, encryption or password protection will always be used. As a best practice, delete sent emails with personal data when no longer needed. Never send file-encryption passwords in conjunction with the encrypted file (always delivered using distinct emails).

DATA TRANSMISSION

1. Our data transmission security policy mandates TLS 1.2 (or later) encryption protocols, implemented according to our infrastructure modernization roadmap.
2. All applications which send/receive traffic over the public internet shall be configured to require/enforce HTTPS connectivity such that all data is transmitted securely.

3. When applicable, VPN tunneling shall be used to secure transmission channels
4. Encryption keys and secrets shall be safeguarded and access restricted

DATA ACCURACY

NSD will take steps to ensure that data is accurate and up to date.

1. Data will be held in as few locations as necessary. Staff will not create any unnecessary data sets.
2. Staff will take every opportunity to ensure data is updated
3. The company will make it easy for data subjects to update the information that Company holds about them. For instance, via their profile page.
4. Data will be updated as inaccuracies are discovered.

DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, data may need to be disclosed to law enforcement agencies without the consent of the data subject. The Company will disclose this data to law enforcement; however, the policy owner will ensure the request is legitimate and will seek advice from the Company's legal advisers where necessary.

REVISION HISTORY

Version	Date	Responsible	Summary of Change
1	2023	Donna Vazquez	Initial
2	8/26/2024	Donna Vazquez	Non-material changes: 1. Transferred to Policy Template 2. Formatting and grammar 3. Ownership update Material changes: 1. Updated website listed in Overview section 2. Added SSN to document Scope 3. Enhancements: a. Appendix A – Applicability to California Only 4. New Sections a. Scope b. Policy Section c. Responsibility d. Enforcement e. Definitions f. Appendix B – PII Protection
3	07/15/2025	Donna Vazquez	Appendix A-1: New section for residents of Colorado, Connecticut, Virginia, and Utah, including rights and UOOM for Colorado. TLS Protocol Update: Clarified reference to TLS 1.2

Version	Date	Responsible	Summary of Change
			Cookie Management Language: Added reference to managing cookie preferences. International Compliance notice under jurisdiction section.