

# Advocate Privacy Practices

*Federal law gives consumers the right to limit some of how your personal information is shared. See how we protect your personal data in our Privacy Notices.*

- Privacy Notice for Advocate Capital..... Pages 2 – 3
- Privacy Notice for AdvoCap Insurance Agency, Inc..... Pages 4 – 5
- California Consumer Privacy Act Notice ..... Pages 6 – 10

# FACTS

## WHAT DOES ADVOCATE CAPITAL DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and payment history
- Employment information and credit based insurance score
- Transaction and credit history

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Advocate Capital chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Advocate Capital share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	No	We don't share.
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don't share.

### To limit our sharing

- Call 1.877.894.9724 to notify us of your choice.

**Please note:**

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

### Questions?

Call 1.877.894.9724.

## What we do

<p><b>How does Advocate Capital Protect my personal information?</b></p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p>
<p><b>How does Advocate Capital Collect my personal information?</b></p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ Open an account or apply for financing</li> <li>■ Give us your contact information or give us your income information</li> <li>■ Pay us by check</li> </ul> <p>We may also collect your personal information from others such as credit bureaus, affiliates, or other companies.</p>
<p><b>Why can't I limit all sharing?</b></p>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your credit worthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
<p><b>What happens when I limit sharing for an account I hold jointly with someone else?</b></p>	<p>Your choices will apply to everyone on your account.</p>
<h2>Definitions</h2>	
<p><b>Affiliates</b></p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Our affiliates include the AdvoCap Insurance Agency, Inc. and companies with an Advocate Capital name and includes Pinnacle Financial Partners, Inc.; financial companies such as Pinnacle Bank and Pinnacle Advisory Services, Inc.; and nonfinancial companies such as PFP Title Company, PNFP Holdings, Inc., PNFP Properties, Inc., Pinnacle Service Company, Inc., Pinnacle Rutherford Towers, Inc., Pinnacle Rutherford Real Estate, Inc., Pinnacle Nashville Real Estate, Inc., and Pinnacle Community Development, Inc.</i></li> </ul>
<p><b>Nonaffiliates</b></p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Advocate Capital does not share with nonaffiliates so they can market to you.</i></li> </ul>
<p><b>Joint marketing</b></p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Advocate Capital doesn't jointly market.</i></li> </ul>

# FACTS

## WHAT DOES ADVOCAP INSURANCE AGENCY INC. DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and payment history
- Employment information and credit based insurance score
- Income and insurance claim history

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons AdvoCap Insurance Agency chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does AdvoCap Insurance Agency share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	No	We don't share.
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don't share.

### To limit our sharing

- Call 1.877.894.3399 to notify us of your choice.

**Please note:**

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

### Questions?

Call 1.877.894.3399.

## What we do

<p><b>How does AdvoCap Insurance Agency protect my personal information?</b></p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p>
<p><b>How does AdvoCap Insurance Agency collect my personal information?</b></p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ Open an account or pay insurance premiums</li> <li>■ Apply for insurance or file an insurance claim</li> <li>■ Pay us by check</li> </ul> <p>We also collect your personal information from others such as credit bureaus, affiliates, or other companies.</p>
<p><b>Why can't I limit all sharing?</b></p>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your credit worthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
<p><b>What happens when I limit sharing for an account I hold jointly with someone else?</b></p>	<p>Your choices will apply to everyone on your policy.</p>
<h2>Definitions</h2>	
<p><b>Affiliates</b></p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Our affiliates include companies with a AdvoCap Insurance name, Advocate Capital, Inc. and includes Pinnacle Financial Partners, Inc.; financial companies such as Pinnacle Bank and Pinnacle Advisory Services; and nonfinancial companies such as PFP Title Company, PNFP Holdings, Inc., PNFP Properties, Inc., Pinnacle Service Company, Inc., Pinnacle Rutherford Towers, Inc., Pinnacle Rutherford Real Estate, Inc., Pinnacle Nashville Real Estate, Inc., and Pinnacle Community Development, Inc.</i></li> </ul>
<p><b>Nonaffiliates</b></p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>AdvoCap Insurance Agency does not share with nonaffiliates so they can market to you.</i></li> </ul>
<p><b>Joint marketing</b></p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>AdvoCap Insurance Agency doesn't jointly market.</i></li> </ul>

This Privacy Notice for California Residents is provided by Pinnacle Bank, a Tennessee Bank, and its subsidiaries and affiliates, including Pinnacle Financial Partners, Advocate Capital, and AdvoCap Insurance Agency ("we" or "us") pursuant to the California Consumer Privacy Act of 2018 ("CCPA") and supplements the information contained in Pinnacle Bank's Privacy Notices.

This notice applies solely to consumers who reside in the State of California ("consumers" or "you"), and to "personal information" as defined in the CCPA. However, as used in this notice, the term "personal information" does not include, and this notice does not apply to:

- Personal information that we collect, process, sell, or disclose pursuant to the federal Gramm-Leach-Bliley Act, and implementing regulations, or the California Financial Information Privacy Act (Division 1.4 (commencing with Section 4050) of the Financial Code);
- Publicly available information from government records;
- De-identified or aggregated consumer information; or
- Other information excluded from the CCPA's scope, including:
  - 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;
  - Personal information covered by other sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) and the Driver's Privacy Protection Act of 1994.

### **Personal Information We Collect**

The table below describes the categories of personal information we may have collected from consumers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>
<b>Identifiers</b>	<i>A real name, alias, postal address, unique personal identifiers, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</i>
<b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b>	<i>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. Some personal information included in this category may overlap with other categories.</i>
<b>Protected classification characteristics under California or federal law</b>	<i>Age (40 years or older), race, color, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information (including familial genetic information).</i>
<b>Biometric information</b>	<i>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, voiceprints or keystroke.</i>

Category	Examples
<b>Internet or other similar network activity</b>	<i>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</i>
<b>Geolocation data</b>	<i>Such as a device location and Internet Protocol (IP) Location</i>
<b>Sensory data</b>	<i>Audio, electronic, visual, thermal, or similar information.</i>
<b>Professional or employment-related information</b>	<i>Current or past job history or performance evaluations.</i>
<b>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</b>	<i>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, and class lists.</i>
<b>Inferences drawn from other personal information</b>	<i>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.</i>

### Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services for which you apply or that you obtain from us.
- From others, such as credit bureaus, affiliates, or other companies.

### Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business and commercial purposes:

- To fulfill the purposes for which 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.
- If you provide your personal information to apply for employment or in the context of your employment, including for purposes of obtaining or maintaining benefits, we will use that information for those purposes.
- To provide, support, personalize, and develop our Website, products, and services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To 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 Website users is among the assets transferred.

## **Sharing Personal Information**

We may share your personal information with the following categories of third parties:

- Service providers.
- Affiliates.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

## **Sales of Personal Information**

We do not offer an opt-out from the sale of personal information because we do not engage in the sale of personal information as contemplated by the CCPA. We have not sold personal information subject to the CCPA, which includes personal information of minors under the age of 16, nor does Bank intend to sell personal information.

## **Disclosures of Personal Information for a Business Purpose**

In the preceding twelve (12) months, we may have disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Biometric information.
- Internet or other similar network activity.
- Sensory data.
- Professional or employment-related information.
- Non-public education information.

## **Your Rights and Choices**

The CCPA provides California consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- The categories of personal information about you that we disclosed for a business purpose, to the extent we have made such disclosures.



***Deletion Request Rights***

Subject to certain exceptions, you have the right to request that we delete the personal information that we collected about you. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

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 good or service that you requested, take actions reasonably 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 products 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 California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
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 likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably 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.

***Exercising 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 following the below instructions:

*For Advocate Capital Clients:*

- Call us at 1.877.894.9724.
- Visit [www.AdvocateCapital.com](http://www.AdvocateCapital.com) and select the “Contact” tab. In the web-form, type “Privacy Request”. In your message, you must include your telephone number for us to process your request.

*For AdvoCap Insurance Clients:*

- Call us at 1.877.894.3399.
- Visit [www.AdvoCapInsurance.com](http://www.AdvoCapInsurance.com) and select the “Contact” tab. In the web-form, type “Privacy Request”. In your message, you must include your telephone number for us to process your request.

Only you, or a person registered with the California 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:

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

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

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 Format***

We will deliver our written response by mail or electronically, to you 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 we reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request if it is excessive, repetitive, or manifestly unfounded.

### **Non-Discrimination**

You have a right to not receive discriminatory treatment for exercising your CCPA rights. Except to the extent permitted by CCPA, we will not discriminate against you for exercising any of your CCPA rights, including by:

- Denying you goods or services;
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing other similar penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's date.

**Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**