

# OSG Website Privacy Notice

**Last Updated and Effective Date:** June 22, 2026

This Privacy Notice (“Notice”) describes how Octave Specialty Group, Inc., its affiliates and subsidiaries (“**Octave**”), collects, uses and shares personal information in connection with any websites, communications, or services that link to this Notice (“**Octave Services**”).

This notice serves as our Notice at Collection under the California Privacy Rights Act and provides required disclosures regarding personal information and your rights under applicable U.S. state privacy laws, the UK General Data Protection Regulation (Retained Regulation (EU) 2016/679), the UK Data Protection Act (2018), the Bermuda Personal Information Protection Act 2016, and other applicable global data protection laws.

## I. PERSONAL INFORMATION COLLECTED THROUGH THE OCTAVE SERVICES

When you interact with the Octave Services, we may collect, and we may have collected in the twelve (12) months prior to the date of this Privacy Notice, certain personal information from you, as described below. The types of personal information we collect from you will depend on your interaction with us.

Category of Personal Information Collected	Categories of Source(s) from which Personal Information is Collected	Business or Commercial Purpose(s) for which Personal Information is Collected, Used or Disclosed	Categories of Recipients to whom Personal Information is Disclosed
<b>Identifiers</b> , such as your name, Internet Protocol (“IP”) address, unique personal identifier, address, email address and telephone number.	From you providing this information directly through the Octave Services (e.g., when you fill out a form to request information from us or when you sign up for alerts).	<ul style="list-style-type: none"> <li>• To communicate with you and respond to your questions.</li> <li>• To provide you with the information, service, or media that you requested.</li> </ul>	We may disclose this information to our service providers or contractors who are performing services on our behalf, such as webpage hosting provider, other webpage related services providers, communications, and cloud storage.
<b>Internet or other electronic network activity information</b> , such as your IP address, cookies, browser type, browser language, operating system, referral sources, pages viewed on the Octave websites, and your	From your use of the Octave Services — this information is automatically collected when you visit the Octave Services through the use of browser information and log files.	<ul style="list-style-type: none"> <li>• To provide you with the Octave Services.</li> <li>• To improve the Octave Services, including statistical analysis of the Octave websites.</li> </ul>	We may disclose this information to our service providers who are performing services on our behalf, such as website hosting provider, other website related services providers,

usage of the Octave Services.			communications, and cloud storage.
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## II. PERSONAL INFORMATION COLLECTED THROUGH BUSINESS COMMUNICATIONS

When you contact Octave, such as by email or telephone, we may collect, and we may have collected in the twelve (12) months prior to the date of this Privacy Notice, certain personal information from you in connection with business communications related to the Octave Services, other communications related to other business initiatives, and other related communications, as described below. The types of personal information we collect from you will depend on your interaction with us.

Category of Personal Information Collected	Categories of Source(s) from which Personal Information is Collected	Business or Commercial Purpose(s) for which Personal Information is Collected, Used or Disclosed	Categories of Recipients to whom Personal Information is Disclosed
<p><b>Identifiers</b>, such as your name, alias, postal address, email address, telephone number, and other similar identifiers.</p> <p><b>Audio, electronic, visual, or similar information</b>, such as recorded audio calls made to our corporate headquarters or staff, recorded Microsoft Teams and Zoom meetings, and from emails received by or sent to Octave.</p> <p><b>Professional related Information and Identifiers</b>, such as name, business title or position, business address, business emails, business telephone numbers, personnel email, telephone number and other business contact information.</p>	<p>From you providing this information directly to Octave staff by emails or telephone calls to individuals at Octave or calls or emails sent by Octave for business related purposes, or electronic meetings.</p>	<ul style="list-style-type: none"> <li>To communicate with you and respond to your questions.</li> <li>To provide you with the information or service that you requested.</li> <li>To consider your application for employment</li> <li>For financial reporting and audit purposes.</li> <li>To communicate with vendors, contractors, service providers and third parties about business related products and services.</li> <li>To communicate about new and existing business opportunities.</li> <li>To communicate with counsel, regulators and law enforcement.</li> </ul>	<p>We may disclose this information to:</p> <p>(i) affiliated entities in the Octave group for internal reporting and the conduct of our business, and other purposes disclosed in this Privacy Notice;</p> <p>(ii) our operations service providers, advisors, and business partners that perform business operations services for us and assist us in carrying out our business activities, such as accountants, actuaries, auditors, lawyers and other advisors; IT systems, support and hosting service providers; internet service providers, printing, advertising, marketing and market research and analysis service providers; banks and financial institutions that service our accounts; document and records management providers; examiners; litigation consultants; and similar outsourced service providers;</p> <p>(iii) governmental or other public authorities (including, but not limited to, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants</p>

			<p>and their accountants, auditors, lawyers and other advisors and representatives, to comply with applicable laws, rules and regulations, including outside the United States, respond to public and government authorities, regulators, and legal inquires, and enforce our rights and defend legal claims;</p> <p>(iv) insurance related businesses, and their related accountants, auditors, lawyers and other advisors and representatives, in connection with any actual or proposed business relationship or merger, sale, joint venture, assignment, transfer or other transaction relating to acquisition of all or any portion of an unaffiliated business; and</p> <p>(v) purchasers and prospective purchasers or other parties in any actual or proposed reorganization, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock, or those of our affiliated companies.</p>
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**III. OTHER USE AND DISCLOSURE OF PERSONAL INFORMATION**

In addition to the uses described above with respect to the Octave Services and business communications, Octave may also use or disclose your personal information (and may have done so in the twelve (12) months prior to the date of this Privacy Notice):

- to comply with applicable laws and regulatory requirements, or as requested by government or regulatory authorities
- in connection with pending litigation
- in connection with a merger, divestiture, acquisition, 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 is among the assets transferred
- to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity
- to debug to identify and repair errors that impair existing intended functionality in the Octave websites or information systems

We may have also used or disclosed your personal information for other purposes with your consent and at your direction.

#### **IV. RETENTION**

We store personal information for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations, and to comply with document preservation requirements relating to litigation.

#### **V. NO SALE OF PERSONAL INFORMATION**

Octave has not sold your personal information to third parties in the twelve (12) months prior to the date of this Privacy Notice. In addition, Octave will not sell your personal information to third parties (including for their own direct marketing purposes). If you are entitled to any disclosure rights in your jurisdiction regarding our sale of your personal information to third parties or our disclosure of your personal information to third parties for their own direct marketing purposes, this disclosure satisfies those requirements. If we change our practices in the future for any new information that we collect from you, we will update this Privacy Notice accordingly. If you still wish to learn more about our compliance with this requirement, please contact us using the information provided in the “Contact Us” section below.

#### **VI. NO SHARING OF PERSONAL INFORMATION**

Octave has not shared your personal information with third parties for cross-context behavioral advertising in the twelve (12) months prior to the date of this Privacy Notice. In addition, Octave has no intention of sharing your personal information with third parties for cross-context behavioral advertising. If you are entitled to any disclosure rights in your jurisdiction regarding our sharing of your personal information to third parties for cross-context behavioral advertising, this disclosure satisfies those requirements. If we change our practices in the future for any new information that we collect from you, we will update this Privacy Notice accordingly. If you still wish to learn more about our compliance with this requirement, please contact us using the information provided in the “Contact Us” section below.

#### **VII. COOKIES AND OTHER DATA COLLECTION TOOLS**

When you use websites operated by Octave, one or more cookies or other digital trackers may be placed on your computer or other electronic device to maintain continuity during a user session, gather data about the usage of its websites, for analytical purposes and other purposes, and to store your preferences for certain kinds of information. The cookies used on the Octave website will track only your online activity on the Octave websites while you are visiting the site and will not track your other Internet activity, such as activity on a non-Octave website. The cookies used by the Octave websites do not gather other personally identifiable information, and the cookies are anonymized.

At any time, you may adjust the settings on your browser to refuse cookies according to the instructions related to your browser. However, if you choose to disable cookies, many of the features on the Octave websites will not operate properly. Lastly, Octave may use other companies

to set analytical cookies on its websites and gather information on our behalf. Octave has implemented analytics and impression reporting on its websites, which track and manage cookie information so that Octave can collect anonymized site analytics data. This information is not used for advertising purposes. Octave uses the cookie information gathered by these companies in the same manner as stated above.

#### **VIII. DO NOT TRACK**

Certain web browsers may provide a do-not-track (“DNT”) option, where you may be able to set your browser to inform websites that you do not wish your activities to be tracked. The Octave websites do not engage any third parties that collect personal information about an individual consumer’s online activities over time and across different websites when the consumer uses the Octave websites. Accordingly, the Octave websites currently do not respond to DNT signals.

#### **IX. EXCLUSIONS**

The Octave websites may contain links to websites owned by other companies. Because Octave has no control over the privacy practices or content of these linked sites, we recommend that you carefully review the privacy policy of each website you visit. Octave is not responsible for the content or privacy practices of websites owned by other companies.

Octave does not seek to, nor do we knowingly collect, information directly from children under the age of 18. If a child has directly provided us with personal information, a parent or guardian of that child may contact us to have the information deleted from our records. To do so, contact Octave through the information provided below in the “Contact Us” section.

#### **X. INTERNATIONAL TRANSFER**

To facilitate Octave’s global operations, Octave may store, transfer and access the personal information that you submit to or from Octave’s offices or service providers or contractors around the world, including in the United States and the United Kingdom. This Privacy Notice shall apply even if Octave transfers such information to other countries. By using the Octave Services and providing any information through the Octave Services, you consent to the transfer of your information and personal information to the facilities in these countries, including those located outside your home country. Do not use the Octave Services if you do not want your personal information to be transferred to the United States or to other countries, or if the laws in your country restrict these types of transfers. Please note that the Octave Services are intended for visitors in the United States and Octave does not target any of its activities or services specifically to other countries, including the United Kingdom or countries in the European Economic Area.

#### **XI. PRIVACY RIGHTS FOR CONSUMERS UNDER U.S. STATE LAWS**

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”) provided California consumers with certain rights with regard to their personal information. Since the CCPA’s passage, similar privacy rights have been extended to consumers in other states under their respective privacy laws.

This Section explains those rights and how to exercise them. If you are a consumer and would like to exercise your privacy rights under applicable state laws, please see subsections H, I and J of this Section below for more information on how to submit a request.

#### **A. RIGHT TO KNOW ABOUT AND ACCESS YOUR PERSONAL INFORMATION**

You may have the right to request that Octave provide you with information regarding what personal information about you we have collected, used, disclosed, sold or shared. Once we receive your request and verify your identity, we will disclose to you the following as applicable:

- The categories of personal information we have collected about you.
- The categories of sources from which we collected your personal information.
- The business or commercial purposes for collecting, selling or sharing your personal information.
- The categories of third parties to whom we disclose your personal information.
- The categories of personal information that we have sold, shared or disclosed for a business purpose, and for each category identified, the categories of third parties to whom we sold, shared or disclosed for a business purpose that particular category of personal information.
- The specific pieces of personal information we collected about you.

#### **B. RIGHT TO DELETE YOUR PERSONAL INFORMATION**

You may have the right to request that Octave delete certain of your personal information that we have collected from you, subject to the exceptions below. Once we receive your request and verify your identity, we will delete (and notify our service providers and contractors to delete), unless the deletion is impossible or involves a disproportionate effort, your personal information in our records that is not subject to any of the allowable exceptions.

##### Exceptions

We may deny your deletion request where your personal information is required for any of the following reasons, which we will identify in our response to you if we deny your request:

- Complete the transaction for which we collected the personal information, fulfill terms of a written warranty or product recall, 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.
- Help to ensure security and integrity, when the use of personal information is reasonably necessary and proportionate.
- Debug to identify and repair errors that impair existing intended functionality.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which information was provided.
- Comply with a legal obligation.
- Deletion is impossible or involves a disproportionate effort.

#### **C. RIGHT TO CORRECT YOUR PERSONAL INFORMATION**

You may have the right to request that Octave correct inaccurate personal information that we maintain about you. Once we receive your request to correct inaccurate personal information and verify your identity, we will use commercially reasonable efforts to correct (and direct our service providers and contractors to correct) your personal information in our records as you have directed.

**D. RIGHT TO OPT-OUT OF THE SALE OF YOUR PERSONAL INFORMATION**

You may have the right to opt-out of the sale of your personal information. However, as indicated in Section V above, we have not sold personal information about you to third parties in the twelve (12) months prior to the date of this Privacy Notice, and we will not sell personal information about you without further notice. If we change our practices in the future for any new information that we collect from you, we will update this Privacy Notice accordingly. As such, we do not offer a right to opt-out of sale.

**E. RIGHT TO OPT-OUT OF THE SHARING OF YOUR PERSONAL INFORMATION**

You may have the right to opt-out of the sharing of your personal information for cross-context behavioral advertising. However, as indicated in Section VI above, we have not shared personal information about you for cross-context behavioral advertising with third parties in the twelve (12) months prior to the date of this Privacy Notice, and we will not share personal information about you for cross-context behavioral advertising without further notice. If we change our practices in the future for any new information that we collect from you, we will update this Privacy Notice accordingly. As such, we do not offer a right to opt-out of sharing.

**F. RIGHT TO LIMIT THE USE OR DISCLOSURE OF YOUR SENSITIVE PERSONAL INFORMATION**

You may have the right to limit the use or disclosure of your sensitive personal information, which is a type of data that receives heightened protection under the law (e.g., certain demographic information, government-issued identification numbers, biometric or health data, etc.). However, we do not offer this right because Octave does not collect sensitive personal information of consumers. If we change our practices in the future for any new information that we collect from you, we will update this Privacy Notice accordingly.

**G. RIGHT TO NON-DISCRIMINATION**

You may have the right to not receive discriminatory treatment for exercising your privacy rights. Octave will not discriminate or retaliate against any consumer who exercises any of the rights described above. Specifically, except as permitted by applicable law, we will not deny you goods or services; charge you different prices or rates, including through granting discounts or other benefits, or imposing penalties; provide you with a different level of service or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**H. HOW TO SUBMIT A REQUEST**

If you are a consumer and would like to exercise any of the privacy rights identified above, you may submit a request by calling us at (800) 221-1854 or sending a letter to us at:

Privacy Request

Attn: Document Management

40 Wall Street  
55th Floor  
New York, NY 10005

## **I. SUBMITTING A REQUEST THROUGH YOUR AUTHORIZED AGENT**

If you are a consumer, you may exercise your privacy rights through an authorized agent. If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, please reach out to us through the “Contact Us” below section.

## **J. HOW WE VERIFY YOUR REQUEST**

We cannot fulfill your request or provide you with your personal information if we cannot, using commercially reasonable methods, 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.

Once you have provided the required information to Octave, we will confirm your identity by conducting a commercially reasonable electronic search of our internal systems (which may include business applications, digital files, and corporate emails) to ensure the information provided by you in your request matches what we have in our systems.

In addition, for a request for specific pieces of information, you (or your authorized agent) must provide to Octave a copy of a signed declaration under penalty of perjury that you are the individual whose information is the subject of the request.

To verify your identity, we will ask that you provide the following information when you submit your request:

- Your first and last name
- Your full address
- State of your primary residence
- Your telephone number
- Your email address

Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfill your request. If we cannot successfully verify your identity, we will inform you of that fact.

We will initially confirm receipt of your request within ten (10) business days. We will then respond to your request within forty-five (45) calendar days. However, in certain circumstances, we may require additional time to process your request, as permitted by the CCPA or other applicable law. We will advise you within forty-five (45) calendar days after receiving your request if such an extension is necessary and why it is needed. If we cannot fulfill your request, our response to you will also explain the reason why we cannot fulfill your request.

We do not charge a fee to process or respond to your consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee (only if permitted by law), we will tell you why we made that decision and provide you with a cost estimate before completing your request.

You may only make a consumer request to know about or access your personal information twice within a twelve (12)-month period.

## **XII. CONTACT US**

For questions or comments regarding this Privacy Notice, or to request this Privacy Notice in another format, please contact us at:

Privacy Request  
Attn: Document Management  
40 Wall Street  
55th Floor  
New York, NY 10005  
1 800 221 1854

## **XIII. UPDATES TO PRIVACY NOTICE**

From time to time, we may update this Privacy Notice. If we do, we will note the date of the revision at the top of this Privacy Notice the date that any changes are made and/or when they become effective. If the changes being made are material, we may alert you to the changes in a more prominent way. By using the Octave Website after these changes are made, you agree to the revised version of the Privacy Notice.