



Effective: April 1, 2021

Please carefully read this Privacy Policy and our Terms of Use before using our Sites

Highland Capital Brokerage, Inc. (future references to “Company” or “we” or “our” or “us” include Highland Capital Brokerage, Inc. and its subsidiaries, divisions, and affiliates) care about your privacy and recognize the importance of protecting your personal information. This Privacy Policy describes the kinds of information we may collect during your visit to our websites (www.highlandbrokerage.com, www.easylifeinsurance.com, www.easylifeinsquotes.com, and www.highlandbrokerage.com/foreign-national) (“Site” or “Sites”), or when you communicate with us or seek or use our products and services; how we use your information; how we protect your information; and how you can exercise options regarding your information.

To better protect your privacy, we provide this notice, which explains:

- The information we collect through our Sites and why we collect it
- How we may use or disclose your information
- The choices you can make about the way your information is collected, used, maintained, protected and disclosed.

Please carefully read this Privacy Policy and our Terms of Use. If you do not agree with our policies and practices, your choice is not to use our Sites or our services. By accessing or using our Sites, you agree to this Privacy Policy. This policy may change from time to time (see [Changes to this Privacy Policy](#)). Your continued use of our Sites after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. Furthermore, please see our Terms of Use for additional information applicable to the use of our Sites.

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The Information We Collect About You and How We Collect It

You do not have to give us personally identifiable information in order to visit our Sites. We may, however, need personal information in order to provide services that you request, and this Privacy Policy explains data collection and use in those situations.

Personal Identifiable Information

Personal identifiable information is generally provided and collected when you search, post, register, participate in a questionnaire or communicate with customer service. As a result of those actions, you may supply us with such information as your name, address, phone numbers, email address, contact preferences and information relating to a support or service issue. This information may, alone or in combination with other data, constitute personally identifiable information. If we collect personally identifiable information from you, you are giving us permission to use that information for the specific purpose for which it is provided and to contact you regarding Site services, improve or enhance Site performance, to offer you information regarding products and services, improve our Site, to communicate to you about other matters that may be of interest to you and for any other purpose described in this Privacy Policy. Users unwilling to provide personally identifiable information online are free to contact us at compliance@highland.com.

Non-Personally Identifiable Information

In addition, we may collect, store and use certain non-personally identifiable information when you visit our Sites. This may include, information about your computer hardware and software, such as the type of browser you are using (e.g., Chrome, Internet Explorer, Firefox, etc.), the type of operating system you are using, (e.g., Windows, macOS, Linux, etc.), the domain name of your internet service provider (e.g., Comcast Xfinity, AT&T Internet Services, EarthLink, etc.), access times and referring Site addresses, and other information collected through cookies or other tracking technologies (see [Usage Details](#)). In addition, we collect information about which pages you visit within our Sites. This Site visitation data is identified only by a unique ID number, and it is never linked with personal information unless a user consents, as described in this Privacy Policy.

How We May Use or Disclose Your Information

Overview of Potential Uses of Your Information

Information about you and our other customers is an important part of our business. We use your personal information for the following purposes:

- To help us create, publish and otherwise tailor the content of our Sites to ensure it is relevant to your needs.
- To deliver services, such as newsletters, events, training or software that you request or purchase.
- To alert you to updated information and other new services from the Company, if you so request.
- To provide you with access to limited-entry areas of our Sites, as appropriate.

We may merge Site-visitation data with anonymous demographic information for research purposes, and we may use this information in the aggregate to provide more relevant content. In some limited-entry sections of our Sites, with your approval, we will combine Site-visitation data with your personal information in order to provide you with personalized content. If you decline permission, we will not provide you the personalized service and we will not merge your personal information with Site-visitation data.

We may send out periodic e-mails informing you of technical service or security issues related to a product or service you requested, or confirming you requested a product or service. You will not be able to choose to unsubscribe to these mailings, as they are considered an essential part of the service you have chosen.

Overview of Potential Disclosures of Your Information

Information about our customers is an important part of our business, and we are not in the business of selling personally identifiable information to unaffiliated third parties for their commercial use. When you register, or otherwise give us personal information, we will not share that information with third parties without your permission, other than as described herein.

- In Compliance with Law or Court Order: We reserve the right to share your personal information with third parties if required to do so by law or if we believe such action is necessary in order to: (a) conform with the requirements of the law or to comply with legal process served upon us; (b) protect or defend our legal rights or property, the Sites, or our users; and (c) investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.
- Agents: We employ or may employ other companies and individuals to perform functions on our behalf. Examples of such functions include removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links) and providing customer service. These companies and individuals have access to personal information needed to perform their functions but may not use it for other purposes.
- Offers: We may send offers to selected groups of customers on behalf of other businesses. If we do this, we will not give that business your name and address.
- Business Transfers: As we continue to develop our business, we might sell or buy subsidiaries or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the customer consents otherwise). Also, in the event that we are acquired or assigned, customer information will of course be one of the transferred assets.
- Protection of our Sites and Others: We reserve the right to release account and other personal information when we believe release is appropriate to comply with the law, enforce or apply our Terms and Conditions of Sites Use and other agreements, or protect the rights, property, or safety of the Company, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk

reduction. However, this does not include selling, renting, sharing or otherwise disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.

- With Your Consent: Other than as set out above, you will receive notice when information about you might go to third parties and you will have an opportunity to choose not to share the information (“opt-out”).

Other Information about the Use and Disclosure of Your Information

We sometimes use the non-personally identifiable information that we collect to monitor user traffic patterns, analyze and quantify user preferences, improve the design and content of our Sites and enable us to personalize your user experience. All such usage data shall be the exclusive property of this Site.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed or accessed by a third party in a manner that is inconsistent with this Privacy Policy.

We may on occasion combine information we receive online with outside records to enhance our ability to market to you those products and services that may be of interest to you. If you have signed up to receive our emails and prefer not to receive marketing information from this Site, please follow the “unsubscribe” instructions provided on any marketing email you receive from this Site.

Finally, this Site will not use or transfer personally identifiable information provided to us in ways unrelated to the ones described above without also providing you with an opportunity to opt out of these unrelated uses.

Rights Under California State Law

If you are a resident of California, you may have rights under the California Consumer Privacy Act of 2018 (“CCPA”) regarding your personal information, as described in this section of our Privacy Policy.

What is Covered by This Section of the Policy?

Most of the data that Highland collects is exempt from these provisions of the CCPA, which do not apply to personal information collected, processed, sold or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. This section of our Privacy Policy therefore does not apply to such information. This section of the Privacy Policy also does not apply to other categories of information that are exempted from the Privacy Policy notification requirements of the CCPA, including certain information processed exclusively in the business-to-business context and information collected about employees, job applicants, and contractors.

Rights Under the CCPA and other California Laws

If your information is covered by the CCPA, you have the rights described in this section.

Right to Request Disclosure of Information We Collect and Share About You

Individuals whose personal information is covered by the CCPA have a right to request that Highland provide the following information:

- The categories of personal information that Highland has collected about you.
- The categories of sources from which Highland collected the personal information.
- The business or commercial purposes for which Highland collected and/or sold the personal information.
- The categories of any third parties with which Highland shared the Personal information.
- The specific pieces of personal information Highland collected over the past year.

Such individuals may also submit a request for the following additional information:

- The categories of personal information, if any, Highland has sold about you, categories of third parties to which Highland sold that personal information, and the categories of personal information sold to each type of third party.
- The categories of personal information that we have disclosed for a business purpose.

Our responses to any of these requests will cover the 12-month period preceding our receipt of the request.

Right to Request the Deletion of Personal Information We Have Collected from You

Individuals whose personal information is covered by the CCPA may also request deletion of information covered by the CCPA that we maintain. Upon receiving and verifying such a request, Highland will delete the personal information, unless that information is necessary for Highland to: complete the transaction for which we collected the information; provide you with a good or service you requested; perform a contract Highland entered into with you; detect security incidents; maintain the functionality or security of Highland's systems; comply with or exercise rights provided by the law; or use the information internally in ways that are comparable with the context in which you provided the information to Highland or that are reasonably aligned with expectations based on your relationship with Highland, among other things. Please note that if you or your authorized agent request that your personal information be deleted, you may no longer be able to access or use certain parts of the Sites.

How To Exercise These Rights

To exercise these CCPA rights, please email compliance@highland.com or call (833) 241-2643

Our Processes for Responding to CCPA Requests

- *Timeline for responding:* We will respond to requests for access or deletion as soon as practicable and in any event generally not more than within 45 days after receipt of your request. We may extend this period to 90 days in some cases.
- *Verifying requests:* Depending on the nature of your request, we may ask you for information to verify your request and identity.

- *Designating an agent:* You may designate an agent to submit a request on your behalf. The agent can be a natural person or a business entity that is registered with the California Secretary of State. If you would like to designate an agent to act on your behalf, you and the agent will need to comply with our agent verification process. You will be required to verify your identity by providing us with certain personal information, depending on the nature of the information you require, which we will endeavor to match with information we maintain about you. Additionally, we will require that you provide us with written confirmation that you have authorized the agent to act on your behalf, and the scope of that authorization. The agent will also be required to provide us with proof of the agency relationship, which may be a declaration attesting to the agent’s identity and authorization by you to act on their behalf, signed under penalty of perjury. If the agent is a business entity, it will also need to submit evidence that it is registered and in good standing with the California Secretary of State. Information to identify and verify your agent can be submitted through the same mechanism and while you submit information to verify your identity. Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.
- *Requests for household information:* There may be some types of personal information that can be associated with a household (a group of people living together in a single home). Requests for access or deletion of household personal information must be made by each member of the household.

Information About the Personal Information We Collect

- The following table categorizes the types of personal information we have collected in the last 12 months, and only with respect to categories of personal information for which the CCPA may require such disclosure in this policy. The table also describes the information we may continue to collect and our uses of that information.

Category of Personal Information (PI) We May Collect	Categories of Sources from Which PI Is Collected	Purposes of Collection (described below)	Categories of Entities with Which PI Is Shared
Identifiers , such as name, postal address, email address, phone number, account name, registration numbers, tax identification number, Social Security number, driver’s license number, passport number, citizenship, date of birth, or other similar identifiers	From our interactions with individuals seeking to obtain or obtaining our products and services or otherwise interacting with or contacting us, including through our Sites and services Automated collection on our Sites, services, products, applications, databases, devices, information systems and networks, and through cookies Product sponsors, service providers, financial institutions, business partners and contacts Current and former employees, directors, other contractors	Client Services Business Operations Marketing Protection and Defense Personnel Services Personnel Administration Regulatory and Legal	Service providers, such as cloud storage providers Regulators/government agencies and self-regulatory associations

	<p>Individuals applying for positions with us or those referring them to us, such as recruiters or referral sources</p> <p>Public sources</p> <p>Government sources and records</p>	<p>Compliance and Oversight</p>	
<p>Unique device and online identifiers, such as IP address, device IDs, or other similar identifiers</p>	<p>Automated collection on our Sites, services, products, applications, databases, devices, information systems and networks, and through cookies</p> <p>Device inventories for company property</p> <p>Personnel who might, for example, supply the device ID associated with their personal device for work purposes</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers, analytics providers, services that advertise our products</p> <p>Regulators/government agencies</p>
<p><i>Characteristics of protected classes and demographic information</i>, such as age, sex, marital status; military or veteran status; criminal history; medical conditions</p>	<p>From our interactions with individuals seeking to obtain or obtaining our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Current and former employees, directors, other contractors</p> <p>Product sponsors, service providers, financial institutions, business partners and contacts</p> <p>Individuals applying for positions with us or those referring them to us, such as recruiters or referral sources</p> <p>Public sources</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers, benefits providers</p> <p>Regulators/government agencies</p>

<p>Commercial and financial information, such as records of personal property, products or services purchased, obtained, or considered, other purchasing or consuming histories or tendencies, information on investments, assets, expenses, net worth, tax status, holdings, account balances, transaction history</p>	<p>From our interactions with individuals seeking to obtain or obtaining our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Current and former employees, directors, other contractors</p> <p>Product sponsors, service providers, financial institutions, business partners and contacts</p> <p>Individuals applying for positions with us or those referring them to us, such as recruiters or referral sources</p> <p>Public sources</p> <p>Government sources and records</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers, benefits providers</p> <p>Regulators/government agencies</p>
<p>Biometric information, such as fingerprint information from employees</p>	<p>Current and former employees, directors, other contractors</p>	<p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers</p> <p>Regulators/government agencies</p>
<p>Internet or other electronic activity information, including information regarding an individual's interaction with our Sites or application, calls and emails sent and received</p>	<p>Automated collection on our Sites, services, products, applications, databases, devices, information systems and networks, and through cookies.</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers, analytics providers, services that advertise our products</p> <p>Regulators/government agencies</p>
<p>Geolocation data</p>			
<p>Audio, electronic, visual, thermal, or olfactory information, such as photographs or voicemail, email</p>	<p>From our interactions with individuals seeking to obtain or obtaining our products and services or otherwise interacting with or contacting us, including through our Sites and services</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p>	<p>Service providers, such as cloud storage providers, benefits providers</p> <p>Business partners, financial services</p>

	<p>Product sponsors, service providers, financial institutions, business partners and contacts</p> <p>Current and former employees, directors, other contractors</p> <p>Individuals applying for positions with us or those referring them to us, such as recruiters or referral sources</p>	<p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>entities, product sponsors,</p> <p>Regulators/government agencies</p>
<p>Professional or employment-related information, such as work history</p>	<p>From our interactions with individuals seeking to obtain or obtaining our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Product sponsors, service providers, financial institutions, business partners and contacts</p> <p>Current and former employees, directors, other contractors</p> <p>Individuals applying for positions with us or those referring them to us, such as recruiters or referral sources</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers, benefits providers</p> <p>Business partners, financial services entities, product sponsors</p> <p>Regulators/government agencies</p>
<p>Education information, such as information about schools attended and degrees and certifications obtained</p>	<p>From our interactions with individuals seeking to obtain or obtaining our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Product sponsors, service providers, financial institutions, business partners and contacts</p> <p>Current and former employees, directors, other contractors</p> <p>Individuals applying for positions with us or those referring them to us, such as recruiters or referral sources</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers</p> <p>Business partners, financial services entities, product sponsors,</p> <p>Regulators/government agencies</p>

<p>Associations and affiliations, such as whether client or personnel are related to someone who is employed in the securities industry, information about related parties to an account, and beneficiaries</p>	<p>From our interactions with individuals seeking to obtain or obtaining our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Product sponsors, service providers, financial institutions, business partners and contacts</p> <p>Current and former employees, directors, other contractors</p> <p>Individuals applying for positions with us or those referring them to us, such as recruiters or referral sources</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal Compliance and Oversight</p>	<p>Service providers, such as cloud storage providers</p> <p>Business partners, financial services entities, product sponsors,</p> <p>Regulators/government agencies</p>
<p>Inferences drawn from PI to create a profile about an individual reflecting, for instance, preferences, characteristics, behaviors, and aptitudes, such as credit history and risk tolerance</p>	<p>We may create analyses from information obtained about applicants for positions with us, employees and contractors, clients and potential clients</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Personnel Services</p> <p>Personnel Administration</p> <p>Regulatory and Legal</p>	<p>Service providers, such as cloud storage providers</p> <p>Business partners, financial services entities, product sponsors,</p> <p>Regulators/government agencies</p>

Additional Information About How We Collect and Share your Personal Information

With respect to each of the categories of data above, we may also share personal information with any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

Non-Discrimination

We are committed to complying with the law. If you exercise any of the rights explained in this Notice, we will continue to treat you fairly.

Accessibility

Highland is committed to ensuring that our communications, such our Sites, are accessible to individuals with disabilities. Individuals with disabilities can access this policy in alternative formats by contacting us at 3535 Grandview Parkway, Suite 600, Birmingham, AL 35243, (833) 241-2643 or compliance@highland.com.

Changes to or Removal of Your Personal Information

If at any time you wish to change, correct, or update the personally identifiable information submitted to the Company, or otherwise have it removed from our database, you may do so at any time by submitting a request by email to compliance@highland.com. We do not sell or disclose your personal information to third parties for their direct marketing purposes.

Usage Details

Cookies

To enhance your experience with our Sites, many of our web pages use “cookies.” Cookies are text files we place in your computer’s browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at our Sites. However, once you choose to furnish our Sites with personally identifiable information, this information may be linked to the data stored in the cookie.

We use cookies to understand Sites usage and to improve the content and offerings on our Sites. For example, we may use cookies to personalize your experience at our web pages (e.g., to recognize you by name when you return to our Sites), save your password in password-protected areas, and enable you to use shopping carts on our Sites. We also may use cookies to offer you products, programs, or services.

Flash Cookies

Certain features of our Sites may use local stored objects (or “flash cookies”) to collect and store information about your preferences and navigation to, from and on our Sites. Flash cookies are not managed by the same browser settings as are used for browser cookies.

Web Beacons

“Web beacons” or clear.gifs are small pieces of code placed on a web page to monitor the behavior and collect data about the visitors viewing a web page. For example, web beacons or similar technology can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. We may use web beacons or similar technology on this Site from time to time for this and other purposes.

Collection of Information by Third-Party Sites, Ad Servers, and Sponsors

Our Sites may contain links to other sites whose information practices may be different than ours. While visiting this Site, you may link to another site via a window opened within (or on top of) our Site. Our Privacy Policies and procedures may or may not be consistent with the policies and procedures of other sites you visit while here. Users should consult, read, and understand any other site’s privacy notices before choosing to provide personally identifiable data on such linked sites. Our Privacy Policy and treatment of your data does not apply on

third party Sites and we have no control over information that is submitted to, or collected by, these third parties.

Our Sites sometimes may offer products, services or content (e.g., promotions) that are sponsored by or cobranded with identified third parties. By virtue of these relationships, the third parties typically have access to the personally identifiable information that you submit, if any, in connection with that offering in order to participate in such particular site's activity. We have no control over these third parties' use of this information.

Our Sites may use a third party to present or serve the advertisements that you may see on our web pages. These third party ad servers may use cookies, web beacons, clear.gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third-party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy.

Our Sites may include links to the sites of other companies, including providers of insurance products and related services. These third parties may collect, use and store personal information about you. We are not responsible for the privacy practices of such unaffiliated third parties and this Privacy Policy does not apply to their use of your information. We encourage you to learn about the privacy policies of those companies.

Our Commitment to Information Security

We have put in place what we believe to be reasonable physical, electronic, and managerial procedures to safeguard your personally identifiable information that we collect and to help prevent its unauthorized access and use. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. To assist in keeping your personal information safe, you must use an SSL-enabled browser.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Additionally, change your passwords often using a combination of letters and numbers, and make sure you use a secure web browser.

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 the security of your personal information transmitted to our Sites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites.

Children under the Age of 13

Our Site is not directed towards children and we do not knowingly collect information from children. If you believe we have any information from or about a child under the age of 13, please contact us at compliance@highland.com.

HIPAA Compliance

As a provider of services and products related to the healthcare industry, we have implemented programs to address the privacy and security implications of the rules

promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).

Usage Terms

Access to and use of this Site is subject to compliance with our *Terms of Use*.

Changes to this Privacy Policy

We reserve the right to make changes to our Privacy Policy from time to time for any reason. Such changes, modifications, additions or deletions shall be effective immediately upon posting, unless otherwise indicated. We have no duty or obligation to inform prior visitors that changes have been made, regardless of the scope and importance of the changes. If we make material changes to our Privacy Policy, we will notify you through a notice on the Site’s home page. The date the privacy policy was last revised is identified on the Sites page which contains the Privacy Policy. You are responsible for periodically visiting our Sites and this Privacy Policy to check for any changes and notifying the Company with any issues.

We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. Your continued use of the Sites after such changes are posted will be deemed to constitute your agreement to and acceptance of such changes.

How to Contact Us

If you have any additional questions or concerns about this Privacy Policy or its implementation, you may contact us directly by email at compliance@highland.com.