

# NOTICE TO POLICYHOLDER

## PRIVACY POLICY

The Company believes personal information that we collect about our customers, potential customers, and proposed insureds (referred to collectively in this Privacy Policy as "customers") must be treated with the highest degree of confidentiality. For this reason and in compliance with the Title V of the Gramm-Leach-Bliley Act (GLBA"), we have developed a Privacy Policy that applies to all of our companies. For purposes of our Privacy Policy, the term "personal information" includes all information we obtain about a customer and maintain in a personally identifiable way. In order to assure the confidentiality of the personal information we collect and in order to comply with applicable laws, all individuals with access to personal information about our customers are required to follow this policy.

### Our Privacy Promise

Your privacy and the confidentiality of your business records are important to us. Information and the analysis of information are essential to the business of insurance and critical to our ability to provide to you excellent, cost-effective service and products. We understand that gaining and keeping your trust depends upon the security and integrity of our records concerning you. Accordingly, we promise that:

1. We will follow strict standards of security and confidentiality to protect any information you share with us or information that we receive about you.
2. We will verify and exchange information regarding your credit and financial status only for the purposes of underwriting, policy administration, or risk management and only with reputable references and clearinghouse services.
3. We will not collect and use information about you and your business other than the minimum amount of information necessary to advise you about and deliver to you excellent service, products, and to administer our business;
4. We will train our employees to handle information about you or your business in a secure and confidential manner and only permit employees authorized to use such information to have access to such information.
5. We will not disclose information about you or your business to any organization outside the of the Company or to third-party service providers unless we disclose to you our intent to do so, or we are required to do so by law.

6. We will not disclose medical information about you, your employees, or any claimants under any policy of insurance unless you provide us with written authorization to do so, or unless the disclosure is for any specific business exception provided in the law.
7. We will attempt, with your help, to keep our records regarding you and your business complete and accurate, and will advise you how and where to access your account information (unless prohibited by law), and will advise you how to correct errors or amend that information; and
8. We will audit and assess our operations, personnel, and third-party service providers to assure that your privacy is respected.

### **Collection and Sources of Information**

We collect from a customer or potential customer only the personal information that is necessary for (a) determining eligibility for the product or service sought by the customer, (b) administering the product or service obtained, and (c) advising the customer about our products and services. The information we collect generally comes from the following sources:

1. Submission -- During the submission process, you provide us with information about you and your business, such as your name, address, phone number, e-mail address, and other types of personal identification information.
2. Quotes -- We collect information to enable us to determine your eligibility for the particular insurance product and to determine the cost of such insurance to you. The information we collect will vary with the type of insurance you seek.
3. Transactions -We will maintain records of all transactions with us, our affiliates, and our third-party service providers, including your insurance coverage selections, premiums, billing, and payment information, claims history, and other information related to your account.
4. Claims -- If you obtain insurance from us, we will maintain records related to any claims that may be made under your policies. The investigation of a claim necessarily involves the collection of a broad range of information about many issues, some of which do not directly involve you. We will share with you any facts that we collect about your claim unless we are prohibited by law from doing so. The process of claim investigation, evaluation, and settlement also involves, however, the collection of advice, opinions, and comments from many people, including attorneys and experts, to aid the claim specialist in determining how best to manage your claim. In order to protect the legal and transactional confidentiality and privileges associated with such opinions, comments, and advice, we will not disclose this information to you; and

5. Credit and Financial Reports -- We may receive information about you and your business regarding your credit. We use this information to verify the information you provide during the submission and quote processes and to help underwrite and provide to you the most accurate and cost-effective insurance quote we can provide.

### **Retention and Correction of Personal Information**

We retain personal information only as long as required by our business practices and applicable law. If we become aware that an item of personal information may be materially inaccurate, we will make a reasonable effort to re-verify its accuracy and correct any error as appropriate.

### **Storage of Personal Information**

We have in place safeguards to protect data and paper files containing personal information.

### **Sharing/Disclosing of Personal Information**

We maintain procedures to assure that we do not share personal information with an unaffiliated third party for marketing purposes unless such sharing is permitted by law. Personal information may be disclosed to an unaffiliated third party for necessary servicing of the product or service or for other normal business transactions as permitted by law. We do not disclose personal information to an unaffiliated third party for servicing purposes or joint marketing purposes unless a contract containing a confidentiality/non-disclosure provision has been signed by us and the third party. Unless a consumer consents, we do not disclose "consumer credit report" type information obtained from an application or a credit report regarding a customer who applies for a financial product to any unaffiliated third party for the purpose of serving as a factor in establishing a consumer's eligibility for credit, insurance, or employment. "Consumer credit report type information" means such things as net worth, creditworthiness, lifestyle information (piloting, skydiving, etc.) solvency, etc. We also do not disclose to any unaffiliated third party a policy or account number for use in marketing. We may share with our affiliated companies, information that relates to our experience and transactions with the customer.

### **Policy for Personal Information Relating to Nonpublic Personal Health Information**

We do not disclose nonpublic personal health information about a customer unless an authorization is obtained from the customer whose nonpublic personal information is sought to be disclosed. However, an authorization shall not be prohibited, restricted, or required for the disclosure of certain insurance functions, including, but not limited to, claims administration, claims adjustment and management, detection, investigation, or reporting of actual or

potential fraud, misrepresentation or criminal activity, underwriting, policy placement or issuance, loss control and/or auditing.

### **Access to Your Information**

Our employees, employees of our affiliated companies, and third-party service providers will have access to the information we collect about you and your business as is necessary to effect transactions with you. We may also disclose information about you to the following categories of person or entities:

1. Your independent insurance agent or broker.
2. An independent claim adjuster or investigator, or an attorney or expert involved in the claim.
3. Persons or organizations that conduct scientific studies, including actuaries and accountants.
4. An insurance support organization.
5. Another insurer, if to prevent fraud or to properly underwrite a risk.
6. A state insurance department or other governmental agency, if required by federal, state, or local laws; or
7. Any persons entitled to receive information as ordered by a summons, court order, search warrant, or subpoena.

### **Violation of the Privacy Policy**

Any person violating the Privacy Policy will be subject to discipline, up to and including termination.

For more information or to address questions regarding this privacy statement, please contact your broker.