

MORAIN ASSOCIATES INSURANCE SERVICES

PRIVACY NOTICE

The privacy of your personal and health information is important to us. Please review this notice carefully.

This Annual Privacy Notice describes how we collect, disclose and protect the personal information we gather about you, and how you can get access to that information. We may materially change our privacy policies and procedures, and if we do we will notify you before we make the changes. We gather two types of protected information about you. 1) Nonpublic PERSONAL INFORMATION and nonpublic PERSONAL FINANCIAL INFORMATION.

PERSONAL INFORMATION includes any list, description or grouping of consumers that is derived using any personally identifiable information that is not publicly identifiable. It includes your name and address as well as the medical, financial and character information that we gather to provide you with insurance.

PERSONAL FINANCIAL INFORMATION is the protected financial information we gather about you.

OUR PRIVACY POLICIES AND PROCEDURES

What kind of information do we collect about you and from whom? We collect several types of PERSONAL INFORMATION about you. Most of the information comes directly from you. The application you complete, as well as any additional information you provide, generally gives us most of the information we need to know in order to recommend to you, or assist you in applying for an insurance plan. Sometimes we may contact you by phone, mail, fax or email to obtain additional information. Depending upon the nature of your insurance transaction, we may need additional information about you or other individuals proposed for coverage from outside sources, such as medical records, credit reports, court records or other public records.

What do we do with the information collected about you? We do not share your PERSONAL INFORMATION with anyone unless allowed by law. As agents for numerous insurance companies, we share PERSONAL INFORMATION you provide to us with insurance companies which we believe may issue insurance coverage appropriate to your needs. Additionally, we may use and disclose information about you in managing your account or benefits, and for monitoring claims you receive through your insurance plan. For example, we maintain information about your premium and deductible payments. We may also provide information to a doctor's office to confirm your eligibility for benefits, or we may ask a hospital for details about your treatment so that we may assist you in receiving appropriate benefits from your insurance plan.

We may contact you to provide information about health-related benefits and services. For example, we may notify you about additional products or programs for which you may become eligible, such as Medicare supplements, individual plans, dental plans, vision plans, life insurance, or long term care insurance.

Information about you may be used or disclosed to regulatory agencies, such as during audits, licensure or other proceedings; or to law enforcement officials in order to comply with a court order or subpoena.

What is our policy regarding disclosure of your information to third-parties?

- Although the law allows us to share your PERSONAL FINANCIAL INFORMATION with affiliated and non-affiliated third parties for marketing purposes, we choose not to do so.

- We are also allowed to share non-transactional information you may have disclosed under the Fair Credit Reporting Act, however, we choose not to do so.
- The law allows us to share the PERSONAL INFORMATION of former customers with third parties in connection with marketing a product or service, but we choose not to do so.

How do we protect the confidentiality and security of your information? We restrict access to nonpublic information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with the law to guard your nonpublic PERSONAL INFORMATION. Confidentiality agreements are obtained from third-party vendors where services they perform for us in connection with our normal business operation may give them access to nonpublic information. Finally, we educate our employees regarding the importance of your privacy.

How can you find out about the information we have about you? You have the right to access, copy, review, and request correction of any PERSONAL INFORMATION in our possession. You must make this request to us in writing and we have 30 days to allow you to review your PERSONAL INFORMATION. If you believe that there is an error in the information, you may request in writing that it be corrected. We have 30 days from receiving the request to make the correction or to inform you as to why we will not make the requested change and the reasons why.

If you disagree with the refusal, you may supply us with a concise statement why you disagree and it will be filed with your PERSONAL INFORMATION.

To whom do we disclose information about you? The law allows or requires us to disclose PERSONAL INFORMATION in the following situations:

- With your written authorization.
- To a non-insurance entity if it is reasonably necessary for us to properly do our business and the other entity agrees not to disclose the PERSONAL INFORMATION.
- To an insurance entity if the disclosure helps the receiving party perform an insurance transaction for you or if it is reasonably necessary to detect or prevent criminal activity, fraud or misrepresentation in connection with an insurance transaction.
- To a medical professional in order to verify coverage or benefits.
- To the Department of Insurance, law enforcement or other governmental entity including an administrative or court order, or as is otherwise required or permitted by law.
- To facilitate the sale of whole or part of an insurance business.
- To a group policyholder to report claims experience or do an audit or to a certificate holder or policyholder to inform them of the status of an insurance transaction.
- To a professional peer review organization to review medical care.
- To the government to determine eligibility for health benefits.
- To a lien holder, etc. or any other having a legal interest in an insurance policy to the extent that the disclosure is needed to protect their interest.