

providers to enter into confidentiality agreements with us, prohibiting them from using any personal information they obtain for any purposes other than those for which they were retained or as required by law. We may also disclose information about you, when necessary or required, in legal and arbitration proceedings and to government agencies.

### **Sharing Personal Information with Other Members**

We are part of a worldwide family of diversified financial services. From time to time we may share personal information about you (other than personal health information and as noted below under “Special Privacy Provisions for Clients with Insurance Policies”) with other financial groups. For example, we may share your information with Nationwide Life Insurance Company, one of the nation’s premier mutual fund advisors and private client money managers, to bring you products and services which we believe will be of value to you. We will not, however, share information about your insurability or credit standing with other members we may be affiliated with.

### **Special Privacy Provisions for Clients with Insurance Policies**

We understand that you may be especially concerned about the privacy of your personal health information. We do not sell or rent your personal health information to anyone or disclose it to others for marketing purposes. Except as you have otherwise authorized, we only use and share personal health information for underwriting insurance, administering your policy and processing claims. Personal health information may also be disclosed when

requested by a governmental agency, in connection with a legal or arbitration proceeding or for other purposes as required or permitted by law.

### **Reviewing Your Personal Information**

If you would like a report on the personal information about you in our possession (other than information collected in connection with or in anticipation of a claim or legal proceeding), you may write us describing the information you would like. If requested, we will also identify in the report any third parties with which we normally share information about you. If you believe that any information we have about you is incorrect or incomplete, you may advise us of any corrections, amendments or deletions which you believe should be made. To obtain a report, please write to Benefit Consulting Group, Inc. 115 ½ South University, Mt. Pleasant, MI 48858, Attention: Privacy Information Center. We may charge you a reasonable fee to cover the costs of providing this information to you.

### **Changes to Our Privacy Policy**

We may make changes to our privacy policy in the future. We will not make any changes affecting you without first sending you a revised privacy policy describing the change. In any case, we will send you a current privacy policy at least once a year as long as you continue to be a client.

### **Contacting Us**

If you have any questions about this privacy policy, please call us at 989-772-4969.

# **BENEFIT CONSULTING GROUP, INC.**

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## **PRIVACY POLICY**

You are a valued client, and we at Benefit Consulting Group, Inc. strongly believe in protecting the confidentiality and security of the information we collect about our annuity, pension, 401(k) Profit Sharing, flexible benefits and insurance clients. We have adopted the following policies and procedures to safeguard the personal information about you in our possession.

### **Our Privacy Pledge**

- \* We do not sell or rent client lists or personal information about you to anyone.
- \* We share client information with our financial professionals, affiliated companies and companies providing services on our behalf in order to service your product and introduce you to other products and services that may be of value to you.
- \* Our policy is to require that all employees, financial professionals and companies providing services on our behalf keep client information confidential.
- \* We only use health information to underwrite insurance, administer policies and process claims.
- \* Our privacy policy applies to both current and former clients.

### **Safeguarding Personal Information**

We have adopted policies and procedures designed to protect your personal information from unauthorized use or disclosure.

- \* We have implemented physical, electronic and procedural safeguards to maintain the

confidentiality and integrity of the personal information in our possession and to guard against unauthorized access. These include, among other things, procedures for controlling access to customer files, building security programs and information technology security measures such as the use of passwords, encryption and firewalls, plus virus and use detection software.

\* We continue to access new technology as it becomes available and to upgrade our physical and electronic security systems as appropriate.

\* Our policy is to permit employees and financial professionals to access your personal information only if they have a business purpose for using such information, such as administering, providing or developing our products and services.

\* Our corporate Ethics Policy Statement (which governs the conduct of all of our employees and financial professionals) requires all employees and financial professionals to safeguard personal information about clients.

### **Information We Collect about You**

We collect information about you to help us serve your financial needs, to provide you with quality products and services and to fulfill legal and regulatory requirements. We consider all information about you in our possession to be personal information, even if you cease to be a client. The personal information we collect about our clients varies according to the products and services being provided and may include, among other things:

\* Identifying information, such as your name, age, address, phone number and social security number.

\* Employment information and information about any high-risk hobbies you may participate in such as skydiving or auto racing.

\* Financial information, such as your income, assets and liabilities, as well as information about your savings, investments, insurance and business.

\* Information about your financial and investment objectives, needs and preferences.

\* Personal health information.

Typically, we collect this information on applications and other forms you complete, through conversations you may have with our financial professionals, with our other representatives and, in some cases, over our websites. We may also collect information from a wide range of other sources, most often to underwrite annuity, pension and insurance products, process claims or provide financial planning and related services. These sources may include healthcare professionals (including physicians, hospitals and other healthcare personnel and facilities), the Medical Information Bureau (a non-profit organization of insurers), and other insurers. They may also include, among others, employers, attorneys, accountants, banks, marketing services, credit reporting agencies, and state and federal agencies.

### **Sharing Information within Our Family of Companies**

We at Benefit Consulting Group, Inc. share personal information about you among ourselves primarily to enable us to provide

you with and administer a wide range of financial products and services. For example, the information you provide to your Benefit Consulting Group financial professional (and on the application and certain other forms you submit) is used to underwrite and issue your annuity, pension or insurance contract. It is also used to assure compliance with insurance and securities laws. Information about you is also shared among ourselves in order to service and administer your annuity, pension or insurance contract and to facilitate communication with you. We may also share such information (except for personal health information and as noted below under “Special Privacy Provisions for Clients with Insurance Policies”) to acquaint you with other products and services offered by us which may be of interest to you. We will protect the privacy of any information you may provide to your financial professional when you purchase any products, financial plans or other services offered by or through us, but we will not be responsible for information provided in connection with the other business activities of any financial professional.

### **Sharing Information with Companies That Provide Services for Us**

We share personal information about you, as required or permitted by law, with third parties, such as service providers who assist us in the day-to-day operations of our companies. These third parties might assist us in a number of ways, such as printing and mailing account statements, processing premium payments or insurance claims, providing marketing services, and assisting with computer processing activities. Our policy is to require third-party service