

## **CAIC CUSTOMER PRIVACY POLICY**

Protecting the privacy and confidentiality of information about our customers is very important to Continental American Insurance Company (CAIC). Accordingly, CAIC has developed and adopted this "Customer Privacy Policy" which is designed to ensure that our collection and use of customer information complies with the following commitments:

- **CAIC does not sell, rent, lease or otherwise disclose nonpublic personal information (NPI) of its customers for purposes unrelated to CAIC products and services.** Our customers' NPI is of paramount importance to us. Therefore, we provide your NPI only to our affiliates<sup>1</sup>, employees, agents and third parties as necessary to facilitate the development and delivery of our insurance and employee benefit products and services. CAIC may also provide your NPI to its affiliates for marketing purposes consistent with the terms disclosed herein (see Sharing Information, below).
- **CAIC works to ensure information integrity and security.** We use technology tools and design our business practices to help ensure that our customers' NPI is properly gathered, stored and processed. We also work to maintain the security of our customers' NPI through the use of technology and our business practices.
- **CAIC expects its agents and employees to respect customer NPI.** CAIC has adopted internal policies and procedures designed to ensure that employees and agents adhere to CAIC's privacy policies and otherwise protect our customers' NPI. Both employees and agents are subject to censure, dismissal, or termination for violation of these policies.

This Customer Privacy Policy applies to those individuals who receive our products and services, as well as to individuals who provide us with NPI in the course of submitting an application to us for our products and services.

### **PRIVACY NOTICE**

CAIC provides this notice to let you know about our current privacy practices with respect to the collection, sharing and protection of your NPI. **You do not need to do anything in response to this notice, unless you would like to prohibit the use of your NPI by our affiliates to market products and services to you, as described below.**

### **Collecting Information**

As part of CAIC's normal underwriting and operating procedures, CAIC (and our agents acting on our behalf) needs to obtain information to determine an individual's eligibility for our products and services, and to perform our insurance functions. CAIC and our agents may collect NPI about CAIC's customers and applicants, including:

- Information from our customers and applicants (including names, addresses, financial and health information).
- Information about our customers' and applicants' transactions with CAIC or our agents (including claims and payment information).
- Information from or about customer's and applicant's transactions with nonaffiliated third parties (including, but not limited to, accident reports, claims, health and insurance application histories, health history, salary data, and information from insurance support organizations [please note that information from a report prepared by an insurance support organization may be retained by that organization and disclosed to other persons]).

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<sup>1</sup> CAIC's affiliates are American Family Life Assurance Company of Columbus and American Family Life Assurance Company of New York.

## **Sharing Information**

- CAIC shares the NPI it collects about you, as described above, among CAIC, its agents, its affiliates, other insurers, insurance support organizations and other third parties so that CAIC and its affiliates may perform their everyday business functions, such as processing your transactions and claims, or otherwise maintaining your policies. CAIC may also disclose NPI to: (a) health care providers; (b) law enforcement agencies, other governmental agencies or authorities, or insurance regulatory authorities or agencies; (c) other parties as necessary to respond to administrative or judicial orders, search warrants, or subpoenas; (d) actuarial or health or other researchers; (e) group policyholders; (f) a party to a proposed sale, transfer, merger, or consolidation of all or a part of CAIC's business; (g) persons pursuant to the Montana Rules of Civil Procedure; and (h) you or as authorized by you. CAIC also reserves the right to share your NPI with its affiliates to enable CAIC affiliates to market their products and services directly to you. You can prevent the use of your NPI for this purpose by following the "opt-out" procedure described below, "*Opting Out of Information Sharing*."
- CAIC does not share, and does not reserve the right to share, customer NPI with nonaffiliated third parties except as permitted or required by applicable law.
- CAIC agents will share your NPI only while acting on CAIC's behalf and, furthermore, will share your NPI only to the extent CAIC itself is permitted to do so.
- Neither CAIC nor its agents will disclose the NPI of former customers unless the disclosure is authorized by or at the request of the former customer, or is otherwise permitted or required by law.

## **Opting Out of Information Sharing**

As described above, CAIC shares your NPI when permitted or required by law. You are not able to limit CAIC's ability to share your NPI for these purposes.

### *Affiliate Marketing Opt Out*

If you would prefer not to receive marketing materials from CAIC's affiliates about their products or services, you can opt out of such affiliate marketing by either (1) calling 1.866.849.0011; or (2) visiting [www.caicworksites.com](http://www.caicworksites.com) and downloading, completing and returning the Affiliate Marketing Opt-Out Form to CAIC at the referenced address. If you opt out and later change your mind, please let CAIC know and we will change your choice. Your opt-out does not prevent CAIC from sending you information about products or services offered by CAIC or its affiliates. Similarly, your opt out will not prevent an CAIC affiliate from using NPI received from CAIC to market affiliate products and services to you if (a) you have a pre-existing relationship with such affiliate, or (b) you contact such affiliate directly and request information about such affiliate's products or services.

## **Confidentiality and Security**

CAIC and its agents safeguard customer (and former customer) NPI by maintaining administrative, technical, and physical safeguards to ensure the security and confidentiality of such NPI. This includes having security practices in place to protect against anticipated threats or hazards, and to protect against unauthorized access to or use of customer and former customer NPI.

CAIC limits access to NPI to only those employees who need access to such information to perform their job functions. Employees who misuse NPI are subject to disciplinary actions. CAIC provides privacy training and awareness to all of its employees.

### **Accessing Information**

You have the right to access recorded information about you (except information relating to a claim or to a civil or criminal proceeding involving you) that is in our files and that we can locate within reason. To ensure the security of information in our files, we will require positive identification before we allow access to that information. To obtain a copy of our information concerning you, send a signed, written request to: CAIC, ATTN: Privacy Office, Post Office Box 427, Columbia, SC 29202. Give your full name, address, telephone number, and policy number, if a policy has been issued, or if the policy has not been issued, give the application date.

Within 30 business days after we receive your request, we will notify you about the information that we can locate and retrieve in our files. We will also tell you to whom we have disclosed this information within the last two years (if recorded) if the information disclosed was not medical record information, and within the last three years if the information disclosed was medical record information. For disclosures of medical record information, we will provide you with the name, address, and institutional affiliation of each person receiving or examining the medical information during the preceding three years; the date of the receipt or examination; and, to the extent practicable, a description of the information disclosed. If you wish, we can show you the information at our headquarters, or we will mail copies to you. However, we reserve the right to disclose medical information only through an approved medical professional of your choice. You may have to pay a reasonable charge to cover the cost of providing the requested information.

### **Correcting Information**

You have the right to request that we correct, amend or delete any of our information about you. Within 30 business days from our receipt of your request, we will either (1) comply with your request and provide the updated information to you, to anyone you specify who has received the information in the past two years, to any insurance support organization to which we have systematically provided personal medical information over the last seven years, and to any insurance support organization that furnished the original information to us or (2) refuse to make the requested changes, notify you of the reasons for the refusal, and inform you that you have the right to file a statement setting forth the information that you feel to be correct and the reasons you disagree with our refusal to make the requested changes. We will keep your statement with your personal medical information and provide it to other parties as if it were corrected information.

### **NOTICE OF INFORMATION PRACTICES**

California, Connecticut, Georgia, Illinois, Kansas, Maine, Massachusetts, Minnesota, Montana, Nevada, New Jersey, North Carolina, Ohio, Oregon, and Virginia require insurers and agents to describe their information practices in addition to providing a Privacy Notice. There is significant overlap between the two notices, but in general our Information Practices include the following: CAIC may obtain information about you and any other persons proposed for insurance. Some of this information will come from you and some may come from other sources. That information and any other subsequent information collected by CAIC may in some circumstances be disclosed to third parties without your specific consent. Residents of these states have the right to access and correct the information collected about them except information that relates to a claim or to a civil or criminal proceeding. They also have the right to receive the specific reason for an adverse underwriting decision in writing. If you wish to have a more detailed explanation of our information practices required by your state, please submit a written request to: CAIC, ATTN: Privacy Office, Post Office Box 427, Columbia, SC 29202.

### **NOTICE OF PRIVACY PRACTICES - PROTECTED HEALTH INFORMATION**

If you would like a copy of CAIC's *Notice of Privacy Practices - Protected Health Information*, issued pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA), copies are available by visiting CAIC's website [www.caicworksites.com](http://www.caicworksites.com) or sending a written request to: CAIC, ATTN: Privacy Office, Post Office Box 427, Columbia, SC 29202.