

## **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, including:

- Information from our customers (including names, addresses, financial and health information).
- Information about our customers' transactions with CAIC or our agents (including claims and payment information).
- Information from or about your transactions with nonaffiliated third parties (including, but not limited to, accident reports, claims, health and insurance application histories, health history, and salary data).

#### **Sharing Information**

- CAIC shares the NPI it collects about you, as described above, among CAIC and its affiliates 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 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.

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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.

### **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.

### **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: Continental American Insurance Company, ATTN: Privacy Office, P.O. Box 427, Columbia, SC 29202.

### **STATE SPECIFIC DISCLOSURES**

Customer NPI shall be collected, used and stored in accordance with applicable federal privacy laws. To the extent that the privacy laws of a Customer's state of residence are more protective of the Customer's NPI than federal privacy laws, CAIC will protect the Customer's NPI in accordance with such state law.

***Attention Washington Residents:*** You have the right to limit disclosures of your nonpublic personal information under the circumstances described in WAC 284-04-510. For instance, you may request in writing that CAIC limit the disclosure of nonpublic personal information to specified individuals if the disclosure of the information to those individuals could jeopardize your safety. In addition, you may also request, in writing, that CAIC limit certain disclosures of information regarding reproductive health, sexually transmitted diseases, chemical dependency and mental health. For more information or if you wish to submit a request, please write to: Continental American Insurance Company, ATTN: Privacy Office, P.O. 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: Continental American Insurance Company, ATTN: Privacy Office, P.O. Box 427, Columbia, SC 29202.