

## **COLUMBIAN FINANCIAL GROUP PRIVACY POLICY**

At Columbian Financial Group (which includes Columbian Mutual Life Insurance Company, Columbian Life Insurance Company, Columbian Financial Services Corporation, and other affiliated companies within our corporate family) we value you as a customer and take your personal privacy seriously. To maintain the trust you have placed in us, we are committed to maintain the privacy and security of your personal nonpublic information that identifies you.

### **Information We May Collect and Save**

Most of the personal information that we collect and save is obtained directly from our customers. We collect and maintain personal information in order to service and administer our customer relationships and transactions, and to carry out other business functions that are permitted or required under state or Federal law. The type of information we collect depends on the type of product or service being provided. The types of information that we may collect include:

- Information you provide to us as part of the application and underwriting process, such as name, address, social security number, birth date, assets, income, and health history.
- Information we receive from other sources such as consumer reporting agencies, banks or employers.
- Information about your transactions or experiences with us and other entities within our corporate family or with outside companies, such as your insurance coverage, transaction history, premium payments, and claims history.
- Information about your health condition that we obtain from health care providers. Health information will be collected as we deem appropriate to determine eligibility for coverage, to process claims, to prevent fraud, and as authorized by you, or as otherwise permitted or required by law.

### **Information We May Disclose and To Whom We May Disclose Information**

We may disclose all the personal information we collect, as described above. We may share personal information in the following types of situations:

- We may disclose all the personal information we collect to service providers, such as insurance agents, third party administrators, data processing companies and other entities that assist us in providing services to you or on your behalf.
- We may disclose all the personal information we collect to companies with which we have marketing arrangements, such as companies that help us market our products and services, and other entities with which we have joint marketing arrangements to jointly endorse or offer financial products or services.
- We may disclose personal information to our affiliates to assist us in administering your business, or to offer you other products or services that we think may be of interest to you. Our affiliates are the family of companies controlled by Columbian Mutual Life Insurance Company, as described more fully in the first paragraph of this notice.
- We may disclose health information to determine eligibility for coverage, to process claims, to prevent fraud, and as authorized by you, or as otherwise permitted or required by law.
- We may also disclose all the information we collect as permitted or required by law. For example, we may disclose information to law enforcement agencies or state insurance authorities.

## **When We Will Notify You**

If you are a current customer, we will send an annual Privacy Policy notice to you. If you later cease to have an active customer relationship with us, we will continue to follow our Privacy Policy and practices, but you will not receive future notices from us.

## **Change In Privacy Policy**

We reserve the right to modify or supplement this Privacy Policy at any time. If we make material changes, we will provide current customers with a revised notice that describes our new practices under the revised Privacy Policy.

## **Our Security Procedures**

We maintain procedures and technology designed to prevent unauthorized access to personal information. We maintain physical, electronic, and procedural protections in accordance with applicable standards to protect personal information. We restrict access to personal information to employees and service providers for legitimate business purposes to assist in providing products or services to you.

## **How to Review and Correct Your Personal Information**

If you ask us in writing to send personal information from your file to you, we will honor that request.

If you believe any of our information about you is incorrect, please notify us in writing and we will investigate. We will correct any errors that we find. If you have any questions about the right of access to or correction of information in your file, please contact us at the address below. To assist us in protecting your personal information from unauthorized inquiries, please include a copy of some type of personal identification, such as your driver's license.

You should send your requests to:

Columbian Financial Group  
PO Box 1381  
Binghamton, NY 13902-1381