

## **COLUMBIAN FINANCIAL GROUP PRIVACY POLICY**

At Columbian Financial Group (which includes Columbian Mutual Life Insurance Company, Columbian Life Insurance Company, Columbian Family Life Insurance Company, Columbian Financial Services Corporation, Golden Eagle Sales 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 information-- nonpublic information that identifies you. This notice is intended to help you understand how we collect, handle and safeguard that information.

This Privacy Policy includes examples of the types of information we may collect and the kinds of companies with whom we may share information. These examples are illustrative and should not be considered a complete description of our information collection or sharing practices. A more detailed description of our information practices will be furnished upon request.

### ***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 all the personal information we collect to unaffiliated third parties for marketing or other purposes, unless you have opted out, as described below. Such outside persons or entities may include, among others, funeral homes, family members, or companies who may want to offer their products or services to you.
- 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 and will give them a reasonable opportunity to opt out of the disclosure of information 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

## ***"Opting Out" - Consumer Selections Regarding Information Sharing***

We are committed to protecting your personal information, and to using or sharing it in ways that will improve or expand upon the services we provide to you. We also want you to know that -- as a valued customer -- you may request through an opt-out response that we not share certain information.

### ***Sharing Personal Information With Unaffiliated Third Parties (Selection 1)***

If you prefer that we not share personal information about you with unaffiliated third parties, you may opt out. That is, you may opt out by directing us at any time not to disclose this information to outside companies. If you wish to opt out of this type of sharing, simply notify us as described below and your request will be honored.

Despite any opt-out, however, we may continue to share personal information under a servicing or joint marketing arrangement with an outside company or as otherwise permitted or required by law.

### ***Sharing Consumer Report Information With Other Columbian Affiliates (Selection 2)***

Columbian affiliated companies (as described more fully in the first paragraph of this notice) may share among themselves consumer report information -- that is, information used to determine your eligibility for credit or insurance offered to you--such as your income, employment status and your account or payment history with others.

If you prefer that we not share consumer report information with other Columbian affiliated companies, you may direct us not to disclose this information to them. If you wish to opt out of this type of sharing, simply notify us as described below at any time and your request will be honored.

As permitted by the Fair Credit Reporting Act, whether or not you have opted out, we may continue to share with other Columbian affiliated companies information that relates to our experiences or transactions with you, for example, policy information, payment history, and some identifying information, such as your name and address.

## **Instructions On How To Notify Us**

If you wish to opt out of the sharing of information as described above, you may opt out by following the instructions on the enclosed Opt-Out Form and mailing the completed form to us.

If there are joint policy owners, any owner can opt out on behalf of the other joint owners.

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The practices and policies contained in this Privacy Policy replace all previous notices or statements with respect to the same subject.

This Privacy Policy will not apply to your relationships with other financial institutions, such as insurance companies and independent insurance agents, that are not part of the Columbian Financial Group. Their privacy procedures will govern how they collect, use and disclose personal information that you allow them to access.

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*Columbian Mutual Life Insurance Company  
Columbian Life Insurance Company  
Columbian Family Life Insurance Company  
Columbian Financial Services Corporation  
Golden Eagle Sales Corporation*

**OPT-OUT FORM**

*Please complete the required information and follow the instructions below in order to opt out of certain information sharing as described in the Columbian Financial Group Privacy Policy.*

Customer Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_ Zip Code: \_\_\_\_\_ Telephone: \_\_\_\_\_

Social Security Number: \_\_\_\_\_ Policy Number: \_\_\_\_\_  
(Optional)

**Sharing Personal Information with Unaffiliated Third Parties (Selection 1):** Do not share personal information with unaffiliated third parties as described in the Columbian Financial Group Privacy Policy.

**Sharing Consumer Report Information with other Columbian Affiliates (Selection 2):** Do not share consumer report information with other Columbian affiliated companies, as described in the Columbian Financial Group Privacy Policy.

***Instructions***

If you wish to opt out of the sharing of information, please check the boxes above to indicate what type of sharing you would like to limit. Also, please write your Social Security Number and policy number, along with your other identifying information requested above. **Please write clearly, as we will be unable to honor opt-out requests that we cannot read.** Please mail your completed form to us at the following address:

Columbian Financial Group  
Opt Out Processing Center  
PO Box 10  
Binghamton, NY 13903-0010