

## STEELPOOL PRIVACY POLICY

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This notice contains the privacy policy of Steelpool Insurance Services, Inc. and is meant to provide you with information regarding how we, as a Life Insurance marketer, use your personal information and what your rights are regarding your non-public personal information.

In order to provide you with the benefits of Life Insurance, we need to collect certain non-public information. In fact, the more we understand about you and your needs, the better we can suggest the right policy for you. However, we are committed to maintaining the privacy of this information in accordance with the law.

All employees and affiliates of our company with access to personal information about our clients are required to follow this policy. Our privacy policy applies to all personally identifiable non-public information about you that is obtained in connection with providing you a life insurance policy. Our privacy policy will continue to cover information we may collect about you during the time your insurance policy is in-force as well as after your insurance policy is no longer in-force.

### **The Kind of Information We Collect**

When you complete your insurance application form, claim form, or other forms, we typically receive the following kinds of information from you:

- Name
- Address
- Date and location of birth
- Marital status
- Sex
- Social Security number
- Medical information

During the course of our business relationship, we may obtain information about:

- Your payment history
- Your tax obligations
- Your investment preferences

If you correspond with us or transact business through our computer Web sites, your browser may provide information to us as you interact with us via the internet.

### **When May We Disclose Your Personal Information**

It is our responsibility to meet your expectations for privacy while still providing you with Life Insurance services and products. In order to provide our services to you, your information may be shared with other service providers.

To complete your Life Insurance application, we may need to provide your non-public information to affiliated and non-affiliated persons or entities involved in the underwriting, processing, servicing and marketing of insurance policies.

Our privacy policy does not permit us to provide any non-affiliated third party with your non-public information unless we have an agreement with the third party that they will protect the confidentiality of your non-public information.

There are times when we are required by law to provide your non-public information to authorized persons or entities. Such occasions include:

- Complying with a subpoena or summons by federal, state or local authorities
- Responding to judicial process
- Responding to regulatory authorities
- Other purposes as required by law

We will not disclose any of your non-public personal information to anyone except as permitted or required by law.

### **Maintaining Security of Your Private Information**

We will work to ensure that your non-public personal information remains confidential and secure. To do so, we have established the following procedures to protect against unauthorized access to your personal information:

- The only persons with access to your non-public personal information are those persons who need to know about the information to underwrite, process, service or market insurance products and services
- We will keep your information physically and electronically secure
- If it comes to our attention that a piece of personal information that we possess may be inaccurate or false we will make a reasonable effort to re-verify its accuracy and correct any error as appropriate

### **Former Clients**

Your non-public, personal information is maintained by us on a confidential and secure basis. If we disclose any of your information, it will be for the reasons and under the conditions described in this notice. We do not disclose any nonpublic personal information about our former clients to anyone except as permitted or required by law.

### **Further Information**

If you have any questions about our privacy policy, please write to:

**Steelpool Insurance Services, Inc.**  
4400 MacArthur Blvd.  
8th Floor  
Newport Beach, California 92660