

INTRODUCTION

At Highland Capital Brokerage (HCB), protecting your privacy is important to us. Whether you are an existing customer or considering a relationship with us, we recognize that you have an interest in how we may collect, use and share information about you. Our goal is to safeguard your privacy. We understand and appreciate the trust and confidence you place in us, and we take seriously our obligation to maintain the confidentiality and security of your nonpublic personal information.

In order to obtain high quality financial products and services for you, we must collect nonpublic personal information about you. When you request a life insurance product, HCB may use a preliminary inquiry form or common application to avoid multiple medical tests; in this way, the information you provide and authorize us to obtain may subsequently be used by one or all of the companies we approach on your behalf as necessary to determine the best offer we can obtain on your behalf. The agent, broker or registered representative with whom you work to obtain financial products or services may use the nonpublic personal information about you in his or her own files to advise you of other products or to help you with your overall financial strategy.

We do not sell your information to third parties, and we disclose your nonpublic personal information only as necessary to provide the products and services you expect from us. This summary of our practices is provided for your information. You do not need to take any action as a result of this notice, but you do have certain rights, which are outlined at the end of this document.

Collecting Information

Collecting nonpublic personal information from you is essential to our ability to offer you high quality insurance products.

We obtain most of the information directly from you, such as name, address, Social Security number, assets and income, employment status and dependent information. This information is provided to us on your inquiry form or application. We may obtain additional information from third parties. Third parties may include agents, employers, plan sponsors or third party administrators, other insurers, health care providers, the Medical Information Bureau or consumer reporting agencies. Information collected may relate to your finances (such as credit relationships and credit history), employment, health, avocations, or other personal characteristics, as well as publicly available information about you. These agencies may retain their reports and share them with others who use their services.

Depending on the type of policy or contract we are pursuing on your behalf, the kind of information we and/or the insurance companies to whom we submit your inquiry or subsequent application may gather additional reports that may include motor vehicle reports, claims reports, credit reports, property inspection reports, and medical reports. Medical information is collected only in connection with underwriting life insurance policies.

Sharing Information

We use the nonpublic personal information we collect to help us apply for products and services you have requested. We may share your nonpublic personal information with companies that help

in conducting our business or perform services on our behalf (for example, underwriters, independent medical examiners and companies that assist with processing data). These companies may use and disclose the information provided to them only for the purpose for which it is provided, as permitted by law.

We may disclose collected information to our affiliates and non-affiliated service providers when necessary to carry out our normal business activities on your behalf. These activities may include evaluating requests for insurance products, administering issued insurance policies and processing transactions at your request. Service providers may include your agent, those who service your policies or our affiliates or other third parties that help us provide you with our products and services.

We will not use or share, internally or externally, personally identifiable medical information for any purpose other than the underwriting of your inquiry form or application; administration of your policy, claim or account; or as disclosed to you when the information is collected, or to which you consent. There may be times when HCB is required to disclose nonpublic personal information, such as when complying with federal, state or local laws, when responding to a subpoena, or when complying with an inquiry by law enforcement, a government agency or regulator (for example, to help us prevent fraud). We do not disclose nonpublic personal information to any third party except as necessary to conduct insurance business on your behalf and as permitted or required by law.

Security

We maintain physical, electronic and procedural safeguards that comply with federal and state regulations to safeguard your nonpublic personal information from unauthorized use or improper access. We restrict access to your nonpublic personal information to those employees who have a business need to know that information in order to provide products or services to you or to maintain your accounts. Our employees are governed by a strict code of conduct and are required to maintain the confidentiality of customer information.

When we provide nonpublic personal information to a service provider, third party or affiliate, we require these providers to agree to safeguard your information, maintain adequate security standards for the protection of collected information, to use the information only for the intended purpose and to abide by applicable law.

Our privacy procedures apply even after you stop having any customer relationship with HCB. We will treat and safeguard information about individuals who terminate their contracts with us as described in this notice.

Your Rights

You have the right to review the nonpublic personal information about you relating to any insurance inquiry, application or product issued through HCB that we can reasonably locate and retrieve. This includes a history of any disclosures of your nonpublic personal health information. If you ask us in writing to send nonpublic personal information from your file to you, we will honor that request, except for certain documents related to claims and lawsuits. However, we cannot send you any medical information we have received about you from a doctor or other health care provider. Instead, you should contact the doctor or health care provider directly to obtain the medical information that you seek.

We will inform you, upon written request, whether or not a consumer report was requested by us, and if so, of the name and address of the consumer reporting agency that furnished the report. If you prefer that we not disclose to others any information we receive about you from a consumer reporting agency, you may direct us not to make those disclosures.

If you believe any of our information about you is incorrect, you may notify us in writing and we will investigate. We will correct any errors that we find. If we do not find any errors, you may file a statement with us that disputes the information in your file. We will send the correction or statement to anyone who received or will receive the original information. If you have any questions about the right of access to or correction of information in your file, please contact us in writing. Please include a copy of some type of personal identification, such as your driver's license. Please direct your inquiry to:

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