

CONSUMER PRIVACY POLICY

Required by the federal Gramm-Leach-Bliley Act and state privacy laws

(State law will apply if it provides more protection than federal law.)

Lumico Life Insurance Company, Elips Life Insurance Company and American Sentinel Insurance Company ("We," "Us," and "Our")

We are committed to keeping the non-public personal information ("NPI") we collect confidential and secure. We want to let you know how we protect your privacy. This Privacy Policy applies to potential, current and former customers.

How do we protect your privacy?

- We restrict access to NPI to our employees who need it for their jobs.
- We use your NPI only as is necessary for us to provide insurance products and services.
- We require non-affiliates that perform services for us to protect your NPI and not use it for any other purpose.
- We verify that anyone asking for your NPI is entitled to it before we give it.
- We collect your health information only with your written authorization.
- We disclose your NPI only as permitted or required by law.
- We do not disclose your NPI to others for their own marketing purposes.
- We do not reveal your health, character, personal habits or reputation to anyone for marketing purposes.
- We maintain physical, electronic, and procedural safeguards to protect your NPI.

What information do we collect?

We need some NPI to determine if you are eligible for our products. Once a contract is issued, we typically only seek NPI when someone asks for more coverage or submits a claim. Some examples of what we may collect:

- Data you provide on applications (name, address, date of birth, Social Security number, income, and beneficiary).
- Medical information from health care providers obtained with your authorization.
- Information about your policies with us (policy number, coverage, premium, and payment history).
- As you have authorized: credit reports from consumer reporting agencies; driving records from the Bureau of Motor Vehicles; medical records from the Medical Information Bureau. (NPI obtained from insurance support organizations may be kept by them and disclosed to others.)

To whom do we disclose information?

We may share your NPI when you ask or authorize us to do so. Also, the law allows certain disclosures without your authorization. We may share some or all of your NPI with affiliates or non-affiliates, as permitted or required by law. Except as described in this notice, the law does not allow you to opt out of these disclosures. Examples of who we may share NPI with:

- Non-affiliates we have hired to help us provide insurance services, such as claims, billing, and customer service vendors and insurance agents; affiliates that help us provide services or audit our operations.
- A consumer reporting agency to detect or prevent fraud.
- A regulatory, legal or government authority, for a compliance audit or under a subpoena or court order.
- Affiliates or non-affiliates that market our products. These parties may include life and health insurers, insurance agents, and marketing firms. We may share your name, address, product purchased, and policy number for these purposes. You have the right to limit our disclosures of this information by following the "Opt Out" procedures identified below.

What are your rights?

- You have the right to know what NPI we have collected about you; this does not apply to NPI that relates to an actual or possible claim or civil or criminal action. You may ask us in writing to correct any NPI you believe is not correct.
- You may ask us in writing for a list of those to whom we have disclosed your medical records within the past two years.
- If we wish to disclose your NPI for reasons not allowed by law, we will ask for your written authorization. If you give it to us, you may revoke it at any time. Revocation is subject to the rights of anyone who acted in reliance of your authorization before it was revoked.

Opt Out

If you do not wish to continue receiving electronic marketing communication by e-mail, you can indicate your preference by using the "opt-out" or "unsubscribe" link provided in such e-mails.

You may also opt out from receiving marketing communication from us and our affiliated companies who use your NPI for their own marketing purposes at optout.lumico.com or by mail using the contact details below.

Once you opt out, we will honor your choice until you ask us to change it. We will continue to share your NPI with affiliated and non-affiliated companies for servicing and administration.

Updates

Our Privacy Policy may be updated from time to time and without prior notice to you to reflect changes in our information practices and/or relevant laws. We will post a notice on Lumico.com and other websites that point to our Privacy Policy to notify you of any material changes to the way we collect and use information. Our Privacy Policy will state when it was last updated.

How do you contact us?

If you have questions about this notice or your NPI, please contact us:

For **Lumico Life Insurance Company** write to:

Lumico Life Insurance Company
Attn: Head of Compliance,
175 King Street, Armonk, New York 10504.

For **Elips Life Insurance Company** write to:

Elips Life Insurance Company
Attn: Head of Compliance,
175 King Street, Armonk, New York 10504.

For **American Sentinel Insurance Company** write to:

American Sentinel Insurance Company
Attn: Head of Compliance,
175 King Street, Armonk, New York 10504

If you have questions about your policy, please contact Customer Service.

If you have a policy that is covered by the Health Insurance Portability and Accountability Act, please refer to our HIPAA Notice of Privacy Practices.