

**Noble & Sears, Inc.
Privacy Policy**

At Noble & Sears, Inc. protecting the privacy and the confidentiality of your personal information has always been of utmost importance. To provide you with the most effective and convenient access to our services we must maintain information about you and your employees. Keeping client information secure and confidential is one of Noble & Sears, Inc.'s top priorities. The purpose of this notice is to let you know how we collect information about you, the type of information we collect and what we may disclose to our nonaffiliated third parties. It also details the steps we take to protect nonpublic personal information. You do not need to take any action as a result of this notice, but you do have certain rights as described below.

1. Information we Collect

The primary reason we collect and maintain customer information is to serve you and administer the products and services you request from us. The type of personal information collected by Noble & Sears, Inc. varies according to the products or services you request, and may include:

- Information included on your application and related forms (such as name, address, telephone number, Social Security number, assets, income, medical and health information);
- Information about your transactions (such as insurance premiums and policy numbers);
- Information from third parties (such as agents, employers, other insurers or health care providers);
- Information about your relationships with us (such as products or services purchased, account balances and payment history);
- Information from your employer, benefit plan sponsor, or association for any of the products you may have (such as name, address, Social Security number, age and marital status);
- Information from consumer reporting agencies (such as credit relationships and history);
- Information from other unrelated companies' sources (medical information, demographic information);
- Information from visitors to the Noble & Sears, Inc. website (such as that provided through on-line forms, site visitorship data and on-line information collection devices known as "cookies"); and
- Information from governmental agencies and independent reporting companies in connection with your application for insurance or other products or services

2. Who has Access to your Information and to whom do we Disclose your Information

We will permit only authorized employees and agents, trained in the proper handling of your personal information, to have access to your information. We will refer to and use the information at issue and service your insurance policy or other products and to process your claims. Except as noted below, we will not disclose information about you without your authorization. We may, without your prior consent and only as permitted by law, provide information:

- Unrelated service providers who we rely upon for marketing, administrative and transaction processing services; reinsurers; and other service providers; all of whom agree to keep the information confidential;
- State Insurance Departments or other governmental agencies, as required by law;
- In responses to a valid summons, court order, search warrant or subpoena, or to protect our legal interests;

3. Protecting the Information

We are committed to maintaining the security and confidentiality of our clients' personal information. To ensure such information is used only in the manner we have described in this policy, we have instituted the following safeguards:

- We will safeguard and keep confidential, pursuant to our security procedure, any personal information you provide us or that we obtain on your behalf. We maintain physical, electronic and procedural safeguards to maintain the confidentiality of your personal information. We restrict access to your personal information to authorized individuals who need to know that information to provide products or services to you.
- We will limit the use of your personal information to the extent necessary to provide you with superior products and services and to administer our business.
- If we hire outside organizations to provide support services, we will require them to maintain the confidentiality of your personal information to the same extent that we do.
- If we enter into negotiations with potential reinsures, affiliates or acquirers, where any personal customer information (usually in the form of policy file) is disclosed, we will require such parties to maintain the confidentiality of your information to the same extent that we do.

4. Consumer Reporting Information

Under the Fair Credit Reporting Act and the Gramm-Leach-Bliley Act you may direct us not to share certain information. If you do not want such non-public personal information shared, you may write to us at the address contained at the end of this notice to request that such non-public personal information not be shared. Your request not to share non-public personal information does not include information we are permitted by law to share.

5. Access to your Information

If required by law, and upon written request, we will make information from your file available for your review. However, we are unable to provide information collected in connection with, or in anticipation of, any claim or lawsuit.

If you have any questions about the right of access to your file (as permitted by law) or wish to elect not to have your nonpublic information shared, please contact us at the address below and include a copy of your personal identification with your request or question.

Barbara R. Sears
Designated Privacy Official
Noble & Sears, Inc.
6711 Monroe Street Bldg 3 Suite D
Sylvania, OH 43560
Phone: 419-882-2150
Fax: 419-885-7057