

# Privacy Policy

MidAmerica Administrative & Retirement Solutions, Inc. takes your privacy very seriously. We share a commitment to protect your privacy and the confidentiality of your personal and financial information.

As a provider of services that involve compiling personal – and sometimes sensitive – information, protecting the confidentiality of that information has been, and will continue to be, a top priority with MidAmerica. We believe that you should know about the information we collect, the measures we take to safeguard it, and the situations in which we might share information with select business partners. This notice explains how MidAmerica handles and protects the personal information we collect. “MidAmerica” refers to MidAmerica Administrative & Retirement Solutions, Inc.

The information we collect and the extent to which we use it will vary depending on the product or service involved. In fact, in certain cases, we may not collect or share some of the types of information noted below. For example, in a number of cases MidAmerica has an agreement with distributors or plan sponsors that limits the sharing of information about its customers with any other company, even if that company is a MidAmerica affiliate. These agreements continue to be honored. Our privacy promise derives from basic principles of trust, ethics and integrity.

For information that we collect that is considered protected health information under the Health Insurance Portability & Accountability Act (“HIPAA”), we comply with the privacy and security regulations under HIPAA. For a copy of the HIPAA privacy notice, please call 1-800-430-7999.

## **1. We collect only the customer information necessary to consistently deliver responsive products and services.**

MidAmerica collects information that helps serve your financial needs; provide high standards of customer service; develop and offer new services for our customers and potential customers; and fulfill legal and regulatory requirements. The information collected generally varies depending on the products or services you request and may include:

Information provided on applications and related forms – for example, name, address, Social Security number, and annual income.

Information from your employer, benefit plan sponsor, or association regarding group products in which you may be enrolled – for example, name, age, address and Social Security number.

Third-party reports, such as consumer credit history, motor vehicle records, demographic and/or medical information, if relevant to your product or service.

Information about your relationships with us, such as products or services purchased, and account balances (if applicable), which we may obtain in writing, during telephone or Internet

transactions or from data gathering software used when you are accessing MidAmerica's website.

## **2. We maintain safeguards to ensure information security.**

We have implemented security standards and processes – including physical, electronic and procedural safeguards – to ensure that access to customer information is limited to authorized and trained employees, registered representatives or agents who may need it to do their job and to ensure the confidentiality of customer information is protected in accordance with our policies. They are required to respect the confidentiality of all customer information.

## **3. We limit how, and with whom, we share customer information.**

First and foremost, we do not sell lists of our customers, nor do we disclose customer information to marketing companies outside MidAmerica, with the exception of companies we may hire to provide specific services for us, as described below. We will share customer information only for the following reasons:

We may be required by law or regulation to disclose information to third parties – for example, in response to a subpoena, to prevent fraud, and to comply with rules of, or inquiries from, industry regulators.

In some cases, we may share information we collect – for example, name, address, age, and Social Security number – with our affiliated and nonaffiliated business partners such as an insurance company in order to process or service a transaction you have requested, to facilitate enhanced customer services, or to inform you of MidAmerica services you may find useful, provided we have obtained the necessary authorizations or opt-out notices, as required by law.

Furthermore, as permitted by federal and state laws, we may share or exchange information with companies engaged to work with us or other third parties, such as:

Third-party administrators and vendors hired to effect, administer or enforce a transaction that you request or authorize; to develop or maintain software; or to perform marketing research.

Financial services entities, such as banks, credit unions, credit union service corporations, insurance companies, or securities broker-dealers, with which we have joint marketing agreements; and vendors who provide us with demographic information to develop marketing plans. The information we may share is described in Section 1. In all cases, where required by the HIPAA privacy rules, we will obtain your written authorization to use or disclose your protected health information for marketing purposes where we receive financial remuneration and for the sale of your protected health information.

Reputable consumer reporting agencies in connection with your insurance product application.

Other than what is described previously or as permitted by the HIPAA privacy rules, we won't share information about you with third parties to market products to you, unless we tell you

about it first, and give you a chance to say no or obtain your written authorization as required. If we are required to offer you an opt-out notice, we will provide you a copy of such notice and a reasonable means to exercise your opt out right. If you have questions about your right to opt out, please contact 1-800-430-7999.

We uphold these privacy principles throughout MidAmerica and its business partners. Companies with which we share customer information are required to maintain the confidentiality of that information.

We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with MidAmerica. While this policy may change from time to time, you can always review our current policy online at: [www.midamerica.biz](http://www.midamerica.biz)

In this notice of our Privacy Promise, the words “you” and “customer” are used to mean any individual who obtains or has obtained a financial product or service through MidAmerica Administrative & Retirement Solutions, Inc., that is to be used primarily for personal, family or household purposes.