

Privacy Notice (Virginia) American Independent Companies, Inc.

Privacy Policy and Practices of American Independent Group and its Affiliates

We value your trust. We are committed to the responsible management, use, and protection of Financial Information. This notice describes how we collect, disclose, and protect Financial Information. Financial Information means information gathered in connection with an insurance transaction. Personal information includes medical information but it does not include privileged claim information or any information that is publicly available. Financial Information is defined as personal information except it does not include medical record information or payment records for health care to an individual.

Question: What types of Information May We Collect?

Answer:

We may collect Financial Information about you that we receive from:

- 1) You on applications and other forms. Examples of Financial Information include your name, address, date of birth, phone number, social security number, credit / debit card number, and driver license number;
- 2) Your agent;
- 3) Your transactions with us, our affiliates, or others. Examples include your policy's account balance, your premium payment history, and your claims history with us; and
- 4) Outside sources such as consumer reporting agencies, including motor vehicle reports, credit reports and loss information reports.

Question: What Types of Information May We Disclose and To Whom?

Answer:

We may share certain Financial Information, only as allowed by law, with affiliated and unaffiliated third parties. For example, we may share your Financial Information with companies that perform marketing for us or with financial institutions that have joint marketing agreements with us. However, we will not share the following Financial Information with others whose only use of such Financial Information is in connection with the marketing of a non-financial product or service:

- 1) Your medical-record information;
- 2) Information relating to your character, personal habits, mode of living, or general reputation;
- 3) Any classification derived from the information disclosed;
- 4) Information that relates to an insurance claim by you; and
- 5) Information that relates to a criminal or civil proceeding involving you.

We will not share your Financial Information with anyone else without your permission unless:

- 1) They are helping us to service or process a transaction; or
- 2) We are otherwise permitted or required by law to do so.

If our practice of not sharing your Financial Information with non-affiliated third parties were to change in the future, we would offer you the ability to "opt-out" of this type of information disclosure. We would allow you at least 30 business days to respond to any "opt-out" offer before the change in our practice would take place.

Examples of others with whom we may share your Financial Information without your permission include:

- 1) Companies that perform a business function for us such as:
 - a) Adjust or investigate claims;
 - b) Program software to help us process customer transactions; or
 - c) Market our own products or minimize unnecessary marketing to you.

- 2) Your agent;
- 3) Insurance-support organizations provided the information disclosed is limited to that which is reasonably necessary to detect or prevent criminal activity, fraud, material misrepresentation, or material nondisclosure in connection with insurance transactions;
- 4) A medical-care institution or medical professional for the purpose of:
 - a) Verifying insurance coverage or benefits;
 - b) Informing an individual of a medical problem which the individual may not be aware; or
 - c) Conducting an operations or services audit.
- 5) An insurance regulatory authority;
- 6) A law-enforcement or other government authority such as government offices or courts which subpoena records;
- 7) Businesses which conduct actuarial or research studies provided no individual may be identified;
- 8) Our affiliates, for internal or agency audits of the marketing of an insurance product or service; and
- 9) A company that may acquire a line of business or function or book of business from us.

Security of Your Information

Our employees have access to Financial Information in the course of doing their jobs, such as underwriting policies, paying claims, developing new products, or advising customers of our products and services. We use manual and electronic security procedures to maintain the confidentiality and the integrity of Financial Information that we have. We use these procedures to guard against unauthorized access. Some techniques we use to protect Financial Information include:

- 1) Secured files;
- 2) User authentication;
- 3) Encryption;
- 4) Firewall technology; and
- 5) The use of detection software.

We are responsible for and must:

- 1) Identify information to be protected;
- 2) Provide an adequate level of protection for that data;
- 3) Grant access to protected data only to those people who must use it in the performance of their job-related duties.

Finally, should your relationship with us end, your Financial Information will remain protected in accordance with the privacy practices as outlined in this notice.

Your Right to Access and Correct Information

You may see and copy in person most of the information about you we have in our files. If you prefer, we will copy and send it to you within 30 business days from the date we receive your request at the address provided below. We will not share privileged information with you. Information collected in connection with a lawsuit or claim is considered privileged. The law may require us to obtain professional approval to share with you certain medical information. We may arrange for an insurance support organization or a consumer reporting agency to copy and disclose to you certain information for us. We will identify any institutional source for information that we share with you.

If you tell us that any of your information in our records is incorrect, we will investigate. Within 30 business days of our receipt of your written request for correction, we will either correct the error or notify you why we decline to do so. If we correct the information, we will also notify others who have received or will receive the disputed information of the correction. If we do not make the requested change, we will provide you the option of filing a statement with us disputing the

information. We will then make that statement available to others who receive the disputed information.

Your request to see and copy such information must be in writing. Include your name, address, policy number, daytime phone number, the best time of the day for us to call, and a copy of identification such as your driver's license.

- 1) If you have a policy with us, you may send your request to:
Omni Insurance Group, Attn: Consumer Affairs, PO Box 105021, Atlanta, GA 30348.
Bankers Independent Insurance Company, Attn: Consumer Affairs, 1000 River Road, Suite 300, Conshohocken, PA 19248
- 2) If you do not have a policy with us but have an insurance transaction with us, such as receipt of a quote, then you may send your request to your agent.

This Privacy Policy is being provided on behalf of the following affiliates of American Independent Companies: American Independent Insurance Holding Company, American Independent Insurance Company, American Independent Services LP, American Independent Services LLC, C & L Insurance Agency, Personal Service Insurance Company, Anson B. Smith & Company, Bankers Independent Insurance Company, Omni Insurance Company, Omni Indemnity Company, Omni Holding Company, Omni General Agency Inc. and Florida Independent Management Company.