

Brownell Insurance Center, Inc.
Privacy Policy Notice
(As of July 1, 2001)

PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about you with a nonaffiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing you with this document, which notifies you of the privacy policies and practices of Brownell Insurance Center, Inc.

OUR PRIVACY POLICIES AND PRACTICES

1. Information we collect:

We collect non-public personal financial information about you from the following sources:

- Information we receive from you on applications and other forms;
- Information about your transactions with us, our affiliates, or others;
- Information we receive from a consumer-reporting agency.

2. Information we may disclose to third parties:

We do not disclose any non-public personal financial information about our customers or former customers to anyone, except as permitted by law.

3. Nonaffiliated third parties to whom disclosures may be made:

We do not disclose any non-public personal financial information about our customers or former customers to anyone, except as permitted by law.

4. Our practices regarding information confidentiality and security:

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulation to guard your nonpublic personal information.

5. Our policy regarding dispute resolution:

Any controversy or claim arising out of or relating to our private policy, or the breach thereof, shall be settled by arbitration in accordance with the rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction thereof.

6. Reservation of the right to disclose information in unforeseen circumstances:

In connection with the potential sale or transfer of its interests, Brownell Insurance Center, Inc. and its affiliates [*if any*] reserves the right to sell or transfer your information (including but not limited to your address, name, age, sex, zip code, state and country of residency and other information that you provide through other communications) to a third party entity that (1) concentrates its business in a similar practice or service; (2) agrees to be Brownell Insurance Center, Inc.'s successor in interest with regard to the maintenance and protection of the information collected; and (3) agrees to the obligations of this privacy statement.