

# **Privacy Policy**

# Our Commitment to You

Fringe Benefit Group is proud to provide employee benefits and services to our customers. Keeping your personal information secure and protecting your privacy rights is important, and it is one of our top priorities. This statement tells you about the information we request from our customers. It also tells you how we safeguard personal information and protect the privacy rights of our current and former customers. Your personal health and financial data are your private information and we hold ourselves to the highest standards in their safekeeping and use.

We do not sell your information to anyone. Rather, we use your information primarily to service your account and benefits you participate in or to make you aware of other products and services we offer.

The Privacy Policy is provided by Fringe Benefit Group, Inc. and all of its affiliates, including Fringe Re, LLC and Fringe Insurance Benefits, Inc. (collectively, "Fringe Benefit Group"). The Fringe Benefit Group provides services for retirement, health and welfare plans including The Contractors Plan and The American Worker as well as other products.

### Plan Sponsors and Group Insurance Contract Holders

This privacy notice is for individuals who utilize our products and services under an employee benefit plan or group insurance contract. In this notice, we refer to the individual employees or beneficiaries who participate as "you".

## Information We Collect About You

You, or your employer, provide personal information about you as part of retirement or insurance programs for which we provide third party administrative or insurance services. You may also provide personal information when you request information or a transaction. We also may obtain personal information from third parties in order to verify your identity or to locate your current address, for example.

Personal information collected from any source may include, among other things, your name and address, social security number, date of birth, employment information, your income, products or services purchased, account balances, payment history, and insurance coverage and premium information about you, or your dependents. The information we collect may vary by product; therefore, some of the examples may not apply to you but are designed to show the general categories of information that may be received and maintained by us. The information we collect about you may be transferred to or stored by Fringe Benefit Group in the United States or elsewhere, as permitted by law.

The health insurance companies we work with may directly request health or medical information from you, or may collect medical information from other sources, for example your doctors, hospitals, other care givers or other sources. Third party health insurance companies maintain their own policies and standards related to your privacy, and you may request additional information on their privacy policies from them. The health insurers must also meet strict standards on the privacy of your health and medical information in accordance with federal and state laws.

The Health Insurance Portability and Accountability Act ("HIPAA") may further limit how we may use and share your information.

You have the right to access and to request amendment or supplement to some of your health records. You may exercise this right by submitting a written request to access and/or amend your records to:

Fringe Benefit Group, Inc. 11910 Anderson Mill Road Austin, TX 78726-1113

## How We Protect Your Personal Information

Within Fringe Benefit Group, we restrict access to information about you to those Fringe Benefit Group employees who need to know the information in order to perform their jobs and service your accounts. To protect your personal information, we design procedures to maintain physical and electronic safeguards, and we review and adjust these safeguards regularly in response to technical or regulatory requirements.

### How We Protect Privacy Online

Our websites use some of the most secure forms of online communication available, including data encryption, Secure Sockets Layer (SSL) protocol, firewall technology and user names and passwords. These technologies provide a high level of security and privacy when you access your account information, initiate online transactions, or send secure messages. We also utilize outside service providers to test our system security.

When you visit our websites, we may collect, either directly or through third-party service providers, certain technical information, such as computer browser type, internet protocol address, pages visited, and average time spent on our website. This information may be used to resolve technical or service problems or to improve our web design and functionality.

## How We Handle Your Personal Information

We do not sell or share information about current or former customers to third parties for sales or marketing purposes.

In order to complete certain transactions or to participate in insurance benefits, it may be necessary to provide identifying information to companies, individuals or groups that are not affiliated with Fringe Benefit Group. For example, if you enroll in an insurance program, we provide required information to the insurance company. We only provide information necessary to complete the service provided by the third party.

In certain instances, we may contract with nonaffiliated companies to perform services for us, for example to mail account statements or to process claims. We disclose the required information we have about you to these third parties, and we only provide the other company with the information necessary to carry out its responsibilities. We require the third parties to treat your private information with the same high degree of confidentiality that we do.

In order to carry out our services to you, or to alert you to other financial products and services Fringe Benefit Group offers or sponsors, we may share your information within the Fringe Benefit Group affiliated companies, to the extent permitted by law.

We will also release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances such as to regulatory authorities.

#### We Will Keep You Informed

We reserve the right to modify this policy at any time but if we do change it, we will inform you.