

# YOUR PRIVACY IS OUR TRUST



**Combined Insurance Company of America**  
**Brad Bennett, President**

## HOW WE FEEL ABOUT PRIVACY

When you applied to Combined Insurance Company of America, you entrusted us with some personal information. Like you, we are concerned with privacy and its protection. Therefore, we want you to know about our procedures for protecting privacy, and your rights and responsibilities regarding recorded information. As our customer, we want you to understand how we gather information, how we protect it, and how its accuracy can be ensured.

## WHAT KIND OF INFORMATION IS COLLECTED

We get most of our information directly from you. Usually, the application you complete gives us all the information we need to evaluate that application. However, in some instances, additional information may be required. In that case, we may obtain information from outside sources at our own expense. For example, we may ask a doctor who has treated the insured to confirm or give us more details about medical information you have given us. Similarly, information may also be requested from an insurance support organization, such as the MIB, Inc. An MIB, Inc. Disclosure Statement is being furnished to you at the time of this application.

In some cases, we may ask an independent source to help us verify information and add to information given on an application. There are many such companies, which are commonly called "consumer reporting agencies," which are in the business of being an outside, independent source of information to insurance companies. If we retain an agency to gather information for us, we will choose one that is discreet and impartial. The reports which would be prepared by such an agency are used to help us decide if the insured qualifies for the insurance applied for. When it is applicable, such a report could include information such as marital status, driving record, job duties, drug or alcohol use or dangerous sport activities.

The information we receive from an independent reporting agency will be treated in the same confidential way in which we treat the information you gave us on your application. However, the information collected by the agency may be retained by them and later shared with others who use these reports. It will be given to others only to the extent permitted by the Federal Fair Credit Reporting Act and your state's Fair Credit Reporting Act, if it has one.

If we use an independent reporting agency to prepare a report, the insured has the right to be personally interviewed by them. Information given the agency during an interview will be included in the report sent to us. If the insured wishes to be interviewed, please tell us how the agency can contact him, and every effort will be made to interview him. Even if the insured is not interviewed, the insured has the further right to request that the reporting agency provide him with a copy of the report it makes. Write us at the address at the end of this notice and we will give you the name and address of any agency we have used to prepare a report so that the insured can contact them directly to find out more about that report.

## WHO HAS ACCESS TO THE

## INFORMATION WE COLLECT

In some circumstances, Combined is authorized or required by law to make disclosures of personal information to third parties, without the insured's authorization. Following are some of the persons or organizations to whom certain items of information might be disclosed: (Please note: This does not mean that all or any of these disclosures have been or will be made about the insured.)

Combined may disclose information about the insured to a person or business to enable them to perform a business, professional or insurance function for us. For example, Combined may disclose personal information to a lawyer or reinsurer who performs a business or professional service for us. We may also disclose information about the insured to an affiliated Combined company, to other insurance companies or to insurance support organizations. These disclosures are limited to the information necessary for the organization to perform its function in connection with an insurance transaction. For instance, your Combined agent will have access to some information in order to provide the insured with adequate service. Also, if we use a consumer reporting agency, we may disclose to them information relating to the insured's identity and perhaps information relating to the type and amount of coverage applied for or in force. Combined in limited circumstances may disclose information about the insured to a medical care institution or a medical professional for the purpose of informing the insured of a medical problem of which he may not be aware.

Combined may also disclose information about the insured to an insurance regulatory authority, such as your State Insurance Department. Too, Combined may disclose information about the insured to a law enforcement or other governmental authority. This will be done only to prevent or prosecute the perpetration of fraud or if we believe that illegal activities have been conducted. We will also disclose information to law enforcement or other governmental authorities where permitted or required by law to do so.

Various industry and professional organizations conduct scientific and actuarial research studies to learn more about the risk experience of our insureds. Other organizations conduct studies relating to medical research. These studies are purely scientific in nature, never identify individuals in their reports, and always maintain information provided in a highly confidential manner. When asked to provide information to such organizations, we ordinarily will do so because the results of such studies are of benefit to our customers and to the public at large.

Combined may also disclose certain information to a person who will only use the information as an aid in the marketing of a product or service. However, no medical-record information, privileged information, or personal information relating to the insured's character, personal habits, mode of living or general reputation will be disclosed. In addition, the insured must be given an opportunity to indicate whether he wants personal information disclosed for marketing purposes. Information may also be disclosed to an affiliate of Combined for use in connection with their marketing activities or in connection with

an audit of Combined. Our affiliates will not disclose the information to persons outside our organization.

Please be assured that the above describes some of the disclosures which *may* be made, not disclosures which are always or even often made. In any event, the information disclosed without the insured's authorization will be only as much as is reasonably necessary to accomplish the intended purpose.

**California Residents** – Your state law requires financial institutions to obtain your consent prior to sharing information about you with non-affiliated third parties. Except as permitted by law, we will not share information we collect about you with non-affiliated third parties while you are a resident of California.

#### **ACCESS TO AND CORRECTION OF INFORMATION IN OUR FILES**

The insured has a right upon written request to us to either see and copy in person or to obtain a copy from us by mail of whatever recorded personal information we have about him in our files. The insured must properly identify himself when making this written request by supplying us with his full name, address, a reasonable description of the information requested, and numbers of all policies about which he is seeking the information. We will, within thirty business days from the date we receive the request, allow the insured to see and copy this information in person or send him a copy of the information if it is reasonably locatable and retrievable by us.

We will also tell the insured the identity, if known, of those persons to whom we have disclosed this personal information within the two years prior to his request. If the identity of these persons is not known, we will tell the insured the names of those persons to whom we normally disclose such information.

Medical record information contained about the insured in our files which is requested, as well as the identity of the medical professional or medical care institution which provide the information, will be disclosed by us either directly to the insured or to a medical professional designated by the insured who is licensed to provide medical care whichever the insured prefers. At the time we will provide this information to the designated medical professional, we will also notify the insured of this disclosure.

In some circumstances our obligations regarding access to recorded personal information may be satisfied by referring the insured to an insurance-support organization.

A fee of \$5.00 will be charged to cover our costs in providing the recorded personal information to the insured.

The insured has a right to make a written request of us to correct, amend, or delete any recorded personal information about him in our possession. If the insured makes such a written request, we will within thirty business days from the date we receive it, either correct, amend or delete the portion of the recorded personal information that is in dispute or notify the insured of our decision not to do so, the reasons for this decision and the insured's right to file a supplementary statement disagreeing with our position.

If we agree to correct, amend or delete the recorded personal information in our possession about the insured, we will notify him in writing. We will furnish the correction, amendment or deletion to any person the insured specifically designates who may have within the preceding two years received the information from us. The correction, amendment or deletion will also be furnished to any support organization which systematically receives such information from Combined and still maintains it about the insured and to any insurance support organization that furnished us with the information that has been corrected, amended or deleted.

If we have determined not to correct, amend or delete the recorded personal information according to the insured's request, he has the right to file a concise statement setting forth what he thinks is the correct, relevant or fair information, and a concise statement of the reasons why he disagrees with our refusal to correct, amend or delete the information. If the insured files either statement, we will file the statement with the disputed information and provide a means whereby anybody reviewing the disputed information will be made aware of the insured's statement and have access to it. We will also in any subsequent disclosure of the disputed information clearly identify the matters in dispute and provide the insured's statement along with the information being disclosed. We will also furnish the insured's statement to those persons and insurance support organizations in the same manner specified above as if we had amended, corrected, or deleted the information.

Should you have any questions about our procedures or information contained in your file, or if you do not want us to share your information for the purpose of making you aware of products and services we believe may be of interest to you, please write us at:

**Combined Insurance  
Attention: Policyholder Service Center  
PO Box 1160  
Glenview, IL 60025-8160  
1-800-544-9382**

#### **NOTICE REGARDING CONSUMER REPORTS**

As part of the normal procedure for processing new insurance applications, we may obtain an investigative consumer report about you. You may, if you wish, request to be interviewed in preparation of this report. Upon written request additional information as to the nature and scope of the report, if one is made, will be provided. Also, upon written request, the insured will be entitled to receive a copy of the investigative consumer report, if one is made, from the consumer reporting agency.

#### **MEDICAL INFORMATION BUREAU DISCLOSURE STATEMENT**

Information regarding your insurability will be treated as confidential. Combined Insurance Company of America or its reinsurers may, however, make a brief report thereon to the MIB, Inc., a not-for-profit membership organization of life insurance companies, which operates an information exchange on behalf of its members. If you apply to another MIB member company for life or health insurance coverage, or a claim for benefits is submitted to such a company, the MIB, upon request, will supply such company with the information on its file.

Upon receipt of a request from you, MIB will arrange disclosure of any information in your file. Please contact MIB at 866-692-6901. If you question the accuracy of the information in MIB's file, you may contact MIB and seek a correction in accordance with the procedures set forth in the federal Fair Credit Reporting Act. The address of MIB's information office is 50 Braintree Hill Park, Suite 400, Braintree, Massachusetts 02184-8734.

Combined Insurance Company of America or its reinsurers may also release information in its file to other life insurance companies to whom you may apply for life or health insurance, or to whom a claim for benefits may be submitted.



**Combined Insurance Company of America**  
**PO Box 6705, Scranton, PA 18505-0705**

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### **MIB PRE-NOTICE**

Information regarding your insurability will be treated as confidential. Combined Insurance Company of America or its reinsurers may, however, make a brief report thereon to MIB, Inc. (MIB), formerly known as Medical Information Bureau, a not-for-profit membership organization of insurance companies, which operates an information exchange on behalf of its members. If you apply to another MIB member company for life or health insurance coverage, or a claim for benefits is submitted to such a company, MIB, upon request will supply such company with the information about you in its file.

Upon receipt of a request from you, MIB will arrange disclosure of any information in your file. Please Contact MIB at 866-692-6901 (TTY 866-346- 3642). If you question the accuracy of the information in MIB's file, you may contact MIB and seek a correction in accordance with the procedures set forth in the federal Fair Credit Reporting Act. The address of MIB's information office is 50 Braintree Hill Park, Suite 400, Braintree, Massachusetts 02184-8734.

Combined Insurance Company of America, or its reinsurers, may also release information from its file to other insurance companies to whom you may apply for life or health insurance, or to whom a claim for benefits may be submitted. Information for consumers about MIB may be obtained on its website at [www.mib.com](http://www.mib.com).

### **NOTICE REGARDING THE FAIR CREDIT REPORTING ACT (INVESTIGATIVE CONSUMER REPORTS)**

This is to inform you that as part of our procedure for processing your insurance application, an investigative consumer report may be prepared whereby information is obtained through personal interviews with your neighbors, friends, or others with whom you are associated or acquainted. This inquiry includes, as appropriate, information as to your character, general reputation, personal characteristics, and mode of living. You may request to be interviewed in connection with the preparation of an investigative consumer report, if one is made. You have the right to send a written request within a reasonable period of time to receive additional detailed information about the nature and scope of this investigation and a copy of the report.

### **ADDITIONAL INFORMATION**

We hope this information helps you understand how and why we obtain information about you and how we use the information. However, if you have any other questions, send them to:

**Combined Insurance**  
**Attention: Privacy Officer**  
**PO Box 6705**  
**Scranton, PA 18505-0705**  
**1-800-225-4500**