

**INITIAL PRIVACY NOTICE  
OF  
CORPORATE STRATEGIES, INC.  
INSURANCE & FINANCIAL SERVICES  
May 2005**

**PURPOSE OF THIS INITIAL PRIVACY NOTICE**

The purpose of this notice is to inform you of Corporate Strategies, Inc. Insurance & Financial Services (CSI) privacy policies and procedures. We protect your nonpublic personal information (NPI) from disclosures that are not allowed by law or restricted or disallowed in this Initial Privacy Notice. CSI gives this Notice as a service to all valued clients and to comply with the requirements of the law.

This Initial Privacy Notice describes how CSI collects, discloses and protects the personal information we gather about you. We may materially change our privacy policies and procedures, and if we do we will notify you before we make any changes.

We gather two types of protected information about you: Nonpublic personal information (NPI) and nonpublic personal financial information (NPMI).

NPI includes any list, description or grouping of clients that is derived using any personally identifiable information that is not publicly identifiable. It includes the medical, financial, and character information that we gather to provide you with insurance as well as your name and address.

NPMI is the protected financial information we gather about you.

**OUR PRIVACY POLICIES AND PROCEDURES**

**1) During the course of operation, we uncover & collect the following NPI about you:**

Name, address (incl. phone/fax numbers), SSN, income, occupation, age, height, weight, marital status, prior insurance history, medical history, controlled drug history, current prescriptions, professional services, payment methods (i.e., credit card & bank information) as well as financial & investment information.

**2) Categories of NPI we disclose.** We do not disclose or share your NPI with anyone unless allowed by law.

**3) Categories of Affiliates and Nonaffiliated Third Parties to whom we disclose NPI.**

- a) **Affiliates.** The law allows us to share your NPI with affiliates: However, we do not share your NPI with affiliates.
  - b) **Nonaffiliated Third Parties.** The law allows us to share your NPI with nonaffiliated third parties under certain circumstances. When it is lawful to do so we share your NPI with the following categories of nonaffiliated third parties: We do not share your NPI with nonaffiliated parties.
  - c) **General Types of Businesses.** The law allows us to share NPI with non-affiliated third parties whose only use will be in connection with the marketing of a product or a service: However, we do not share your NPI with third parties for marketing purposes.
- 4) **Former Customers.** The law allows us to share the NPI of former customers: However, we do not share the NPI of former customers.
- 5) **Disclosure to an Affiliate for Marketing Purposes.** The law allows us to share your NPFI with our affiliates to market insurance products or a service to you: However, we do not share your NPFI with our affiliates.
- 6) **Opting Out of Disclosure to Nonaffiliated Third Parties.** The law allows us to share NPFI with nonaffiliated third parties for marketing purposes: However, we do not share your NPFI with nonaffiliated third parties for marketing purposes.
- 7) **Disclosures Made of NPFI Protected by the Federal Fair Credit Reporting Act.** The law allows us to share non-transactional information you disclosed under the Fair Credit Reporting Act: However, we do not share this information.
- 8) **How We Protect the Confidentiality and Security of NPI. We protect and safeguard your NPI:** Our insurance office will monitor and ensure that during business hours no person is unescorted or unmonitored within the office unless they are an employee or business associate. Our insurance office will identify, monitor and control who is authorized to possess keys or necessary codes for securing and entering the office. Our insurance office will obtain written consent from all nonaffiliated third parties who will have access to or receive NPI in the course of their duties to us. Our insurance office will secure all physical data that contains NPI. All files not in use will be filed. All file containers will be secured when the office is closed or not occupied. Our insurance office will provide controls on access to and authentication of persons using electronic data. Our office will install, maintain, and update necessary virus protection, firewall protection as needed.
- 9) **Your Right to Access, Copy Review and Request Correction of NPI:** You have the right to access, copy review, and request correction of any NPI in our possession. You must make this request to us in writing and we have 30 days to allow you to review your NPI. If you believe that there is an error in the information, you may request in writing that it be corrected. We have 30 days from receiving the request to make the correction or to inform you as to why we will not make the requested change and the reasons why. If you disagree with the refusal, you may supply us with a concise statement why you disagree and it will be filed with your NPI.

**10) Disclosure of NPI Under Specific Exceptions.** The law allows or requires us to disclose NPI in the following situations:

- a) With your written authorization
- b) To a non-insurance entity if it is reasonably necessary for us to properly do our business and the other entity agrees not to disclose the NPI.
- c) To an insurance entity if the disclosure helps the receiving party perform an insurance transaction for you or if it is reasonably necessary to detect or prevent criminal activity, fraud, or misrepresentation in connection with an insurance transaction.
- d) To a medical professional in order to:
  - 1) Verify coverage or benefits, conduct operations or service audits.
  - 2) Inform a person a medical problem they might not be aware of.
- e) To the Department of Insurance, law enforcement or other governmental entity including an administrative or court order, or as is otherwise required or permitted by law.
- f) To conduct actuarial or research studies if there are proper safeguards.
- g) To facilitate the sale of whole or part of an insurance business.
- h) To a person whose only use will be for marketing a product or service.

However please note:

- 1) No medical or character information may be disclosed.
  - 2) You may “opt out” of the disclosure.
  - 3) The person getting the information agrees to use it only for marketing purposes.
- i) To an affiliate for an insurance audit or marketing an insurance product or service:
    - 1) The information can only be used by the affiliate and only for those purposes.
  - j) By a consumer reporting agency if the information does not go to an entity.
  - k) To a group policyholder to report claims experience or do an audit or to a certificate holder or policyholder to inform them the status of an insurance transaction.
  - l) To a professional peer review organization to review medical care.
  - m) To the government to determine eligibility for health benefits.
  - n) To a lien holder, etc. or any other having legal interest in an insurance policy to the extent that the disclosure is needed to protect their interest.

**INITIAL PRIVACY NOTICE  
OF  
CORPORATE STRATEGIES, INC.  
INSURANCE & FINANCIAL SERVICES  
April 2003**

**RECEIPT & ACKNOWLEDGEMENT**

By signing my name below I acknowledge that I received Corporate Strategies, Inc. Initial Privacy Notice and understand its terms.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Spouse Signature (if applicable)

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Printed Name

Executed on \_\_\_\_\_ at \_\_\_\_\_, California.  
Date City