

**INITIAL PRIVACY NOTICE OF
LINDSTROM INSURANCE
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PURPOSE OF THIS INITIAL PRIVACY NOTICE

The purpose of this notice is to explain our privacy policies and procedures. We protect your nonpublic personal information and nonpublic personal financial information from disclosures that are not allowed by law or restricted in this Initial Privacy Notice. Lindstrom Insurance gives this Notice as a service to all valued customers and to comply with the requirements of the law.

This Initial Privacy Notice describes how we collect, disclose and protect 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 the changes.

OUR PRIVACY POLICIES AND PROCEDURES

1. Categories of Personal Information We Collect. We collect several types of information about you that is necessary for the processing of claims, for underwriting or applying for insurance, to fulfill legal and regulatory requirements, and to find answers to your questions. Categories are:

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| ◆ Your name, address, and zip code. | ◆ driving record. |
| ◆ date of birth. | ◆ electronic mail addresses. |
| ◆ telephone and fax numbers. | ◆ information about your dependents. |
| ◆ social security numbers. | ◆ past insurance carrier information. |
| ◆ insurance ID numbers. | ◆ information about your job duties and hobbies. |
| ◆ health information and health history. | ◆ financial information including net worth and earnings (generally for life and disability insurance). |
| ◆ provider information. | |

2. Categories of personal information we may disclose. We do not share your personal information with anyone unless permitted by law and needed for your insurance purchase or ongoing service, such as following up on claims for you. The categories of information we share are those listed in the application you complete for insurance, any medical records you provide, any financial statements you submit, and only for the purpose of obtaining coverage for you, getting answers to your questions, and providing service.

3. Categories of affiliates and non-affiliated third parties to whom we disclose private information:

Affiliates. We have no Affiliates as defined by the law.

Non-affiliated Third Parties. The law allows us to share your personal information with non-affiliated third parties under certain circumstances. When it benefits you, we may share information with the following categories of non-affiliated third parties: insurance companies, general agents, third party administrators, HMOs, and providers such as hospitals, medical and dental offices, clinics and pharmacies. If your policy is written in conjunction with another agent or agency, some of your information may be shared with the other agent or agency. Only the minimum amount of your information will be disclosed to fulfill your request or business purpose.

General Types of Businesses. Some of your information may be disclosed to our attorney or accountant or others required by law.

4. Former Customers. The law allows us to share the personal information of former customers. We continue to adhere to the policies and practices described above even if you are no longer our customer.

5. Opting Out of disclosure to non-affiliated third parties for joint marketing. The law allows us to share personal information with non-affiliated third parties for marketing purposes. If you do not want us to disclose personal information about you to non-affiliated third parties, you may tell us so. This is known as "opting-out." The law requires that we give you notice and an opportunity to prevent disclosure of your personal information to affiliated third parties. We may share personal information about you if we do not hear from you within 45 days of receiving our "opt-out notice." We will provide you with an electronic means, a toll-free phone number, or our postage paid return form to make your selection. However, you may opt-out at any time. Your "opt-out" will remain in effect until revoked in writing by you. Just call or write or email us.

6. Disclosures of personal information protected by the Federal Fair Credit Reporting Act. The law allows us to share information you disclosed under the Fair Credit Reporting Act. However, we do not share this information.

7. How we protect the confidentiality and security of personal information. We protect and safeguard your personal information. Access to nonpublic personal information about you is limited to our employees and the other parties described above. We protect electronic and paper files containing your information. We maintain physical, electronic and procedural safeguards that meet or exceed federal standards to guard your nonpublic personal information. Employees receive regular training to reinforce these practices. We never use email for solicitation or advertising. Lindstrom Insurance never sells or gives your email address or mailing address to anyone except as necessary to provide our products and services to our customers. Our written Privacy Policies and Procedures document is available upon request.

8. Your right to access, copy, review, and request correction of personal information. You have the right to access, copy, review and request correction of any personal information in our possession. You must make this request to us in writing and we have 45 days to allow you to review your personal information. If you believe that there is an error in the information, you may request in writing that we correct it. We have 45 days from receiving the request to make the correction or to inform you why we will not make the requested change. If you disagree with the refusal, you may supply us with a concise statement why you disagree and it we will be file it with your personal information.

9. Allowed or required disclosure of personal information under specific exceptions. The law allows or requires us to disclose personal information in the following situations:

- ◆ With your written authorization
- ◆ 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 personal information
- ◆ 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
- ◆ To a medical professional in order to:
 1. Verify coverage or benefits, conduct operations or service audits; or
 2. Inform a person of a medical problem they might not be aware of
- ◆ To the Department of Insurance, law enforcement or other governmental entity including an administrative or court order, or as otherwise required or permitted by law
- ◆ To conduct actuarial or research studies if there are proper safeguards
- ◆ To facilitate the sale of whole or part of an insurance business
- ◆ To a wholly owned affiliate whose only use will be for marketing a financial product or service if:
 1. No medical or character information will be disclosed.
 2. The person getting the information agrees to use it only for the purposes for which it was intended
- ◆ To a non-affiliated third party for the marketing of a joint financial product or service with us if:
 1. The information can only be used by the non-affiliate for marketing our joint financial products.
 2. You have been given the opportunity to opt-out and have not done so.
 3. No medical information is disclosed.
- ◆ By a consumer reporting agency if the information does not go to an entity
- ◆ To a group policyholder to report claims experience or do an audit or to a certificate holder or policyholder to inform them of the status of an insurance transaction
- ◆ To a professional peer review organization to review medical care

Please feel free to contact us if you have any questions about our Privacy Policy and Practices.