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## PRIVACY POLICY AND PRACTICES

THIS NOTICE IS PROVIDED TO SATISFY OLD GLORY INSURANCE COMPANY'S NOTICE OBLIGATIONS UNDER FEDERAL AND STATE LAW.

Old Glory Insurance Company has made ensuring your privacy a top priority. In order to provide reliable products and services that accommodate your insurance needs, Old Glory obtains certain personal information, which is described below in The Personal Information We Collect. **We do not disclose any non-public, personal information about our customers to anyone, except as required or permitted by law. We do not sell any information about our customers to mailing list companies or mass marketing organizations.**

**The Personal Information We Collect.** Old Glory collects personal information about you and the members of your household to conduct business operations, provide customer service, settle claims and satisfy legal and regulatory requirements.

We may collect the following categories of information about you from these sources:

Information directly from you or through an agent or broker including information from applications, monthly audit reports, annual audit reports, claim forms or other documents (such as name, address, phone number, social security number, or federal identification number, occupation, assets, revenue, payroll information, and prior carrier information);

Information from rating organizations;

Information from other non-Old Glory sources (such as prior loss information);

Information through safety/loss control inspections or claims investigations;

Information from a consumer reporting agency (such as motor vehicle reports);

**The Personal Information We Share.** Old Glory may disclose the personal information we collect to service, process, or administer business operations such as underwriting and claims, and for other purposes such as regulatory compliance, the detection or prevention of fraud, or as otherwise required or allowed by law. These disclosures may be made without prior authorization from you, as the law permits.

**Sharing Personal Information with Others.** Old Glory may disclose personal information we collect to affiliated and non-affiliated parties for processing and service providers including: reinsurers, insurance agents or brokers, auditors, independent claim adjusters, third party administrators, independent safety or loss control engineers, employers, claims related experts and engineers. For example, we may disclose information to our affiliates and other parties that perform services for us such as customer service or account maintenance. Personal information may also be disclosed to non-affiliated parties as permitted or required by law. For example, information may be disclosed to detect or prevent fraud or to comply with an inquiry of a government agency or regulator, or in response to a summons or subpoena.

**Confidentiality and Security of Personal Information.** Old Glory is responsible for identifying information that must be protected and providing an adequate level of protection for that data. Old Glory allows access to nonpublic personal information about you and your employees only to individuals who must use it in the performance of their job-related duties. Those who have access to personal information (such as underwriters, customer service representatives, auditors and other audit personnel, claims services/processing personnel) are obligated to safeguard such information. In addition to contractual safeguards with our affiliates, we maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

**Sharing Personal Information with Service Providers or For Joint Marketing.** Old Glory reserves the right to disclose nonpublic personal information collected by us, to companies, service providers and financial institutions that perform functions for us, with which we have joint marketing agreements. This information about your transactions with us, our affiliates or others may include policy coverage, premium, loss history, payment history and claims information, as well as information we receive from a consumer-reporting agency, such as your creditworthiness and credit history. Any disclosure of this nature is required to be subject to an agreement with us, that contains a confidentiality provision.

**Personal Health Information.** Under certain circumstances, we must collect personal health information about our customers, such as information regarding an accident, disability or injury, for underwriting or claim purposes.

**Definitions.**

“Customers” and “You” refers to any individual or authorized representative of an individual, who obtains or has obtained an insurance product or service from Old Glory Insurance Company.

“Personal Information” refers to any nonpublic information, which is defined by law as personally identifiable financial information provided by you or your authorized representative to Old Glory, as the result of a transaction with or any service performed for you by Old Glory or otherwise obtained by us. Personal Information does not include publicly available information as defined by applicable law.

“Old Glory” and “we” includes the following companies on whose behalf this notice is given:

Old Glory Insurance Company - Employees of Old Glory Insurance Company and any subsidiary of Heartland Security Insurance Group.