

PRIVACY POLICY

Required by the federal Gramm-Leach-Bliley Act and state privacy law

(State law will apply if it provides more protection than federal law.)

Lumico Life Insurance Company and Elips Life Insurance Company ("We," "Us," and "Our")

We are committed to keeping the non-public personal information ("NPI") we collect confidential and secure. We want to let you know how we protect your privacy. Our Privacy Policy applies to potential, current and former customers.

How do we protect your privacy?

- We restrict access to NPI to our employees who need it for their jobs.
- We use your NPI only as is necessary for us to provide insurance products and services.
- We require non-affiliates that perform services for us to protect your NPI and not use it for any other purpose.
- We verify that anyone asking for your NPI is entitled to it before we give it.
- We collect your health information only with your written authorization.
- We disclose your NPI only as permitted or required by law.
- We do not disclose your NPI to others for their own marketing purposes.
- We do not reveal your health, character, personal habits or reputation to anyone for marketing purposes.
- We maintain physical, electronic, and procedural safeguards to protect your NPI.

What information do we collect?

We need some NPI to determine if you are eligible for our products. Once a contract is issued, we typically only seek NPI when someone asks for more coverage or submits a claim. Some examples of what we may collect:

- Data you provide on applications (name, address, date of birth, Social Security number, income, and beneficiary).
- Medical information from health care providers obtained with your authorization.
- Information about your policies with us (policy number, coverage, premium, and payment history).
- As you have authorized: credit reports from consumer reporting agencies; driving records from the Bureau of Motor Vehicles; medical records from the Medical Information Bureau. (NPI obtained from insurance support organizations may be kept by them and disclosed to others.)

To whom do we disclose information?

We may share your NPI when you ask or authorize us to do so. Also, the law allows certain disclosures without your authorization. We may share some or all of your NPI with affiliates or non-affiliates, as permitted or required by law. Except as described in this notice, the law does not allow you to opt out of these disclosures. Examples of who we may share NPI with:

- Non-affiliates we have hired to help us provide insurance services, such as claims, billing, and customer service vendors and insurance agents; affiliates that help us provide services or audit our operations.
- A consumer reporting agency to detect or prevent fraud.
- A regulatory, legal or government authority, for a compliance audit or under a subpoena or court order.

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- Affiliates or non-affiliates that market our products. These parties may include life and health insurers, insurance agents, and marketing firms. We may share your name, address, product purchased, and policy number for these purposes. You have the right to limit our disclosures of this information by following the "Opt Out" procedures identified below.

What are your rights?

- You have the right to know what NPI we have collected about you; this does not apply to NPI that relates to an actual or possible claim or civil or criminal action. You may ask us in writing to correct any NPI you believe is not correct.
- You may ask us in writing for a list of those to whom we have disclosed your medical records within the past two years.
- If we wish to disclose your NPI for reasons not allowed by law, we will ask for your written authorization. If you give it to us, you may revoke it at any time. Revocation is subject to the rights of anyone who acted in reliance of your authorization before it was revoked.
- We may change our Privacy Policy from time to time. If we do, we will provide you with all of the legal rights to which you are entitled. This privacy notice supersedes all such prior notices we may have provided to you.

Opt Out

You may instruct us to not to share your NPI with affiliates or non-affiliates for marketing purposes. In addition, you may instruct us not to share consumer information with affiliates. You may provide these instructions by "opting out" of this sharing by visiting us at optout.lumico.com.

How do you contact us?

If you have questions about this notice, please contact us:

For **Lumico Life Insurance Company** write to:

Lumico Life Insurance Company
Attn: Head of Compliance,
175 King Street, Armonk, New York 10504.

For **Elips Life Insurance Company** write to:

Elips Life Insurance Company
Attn: Head of Compliance,
175 King Street, Armonk, New York 10504.

If you have questions about your policy, please contact Customer Service.