

Consumer Privacy Policy

MIB Group, Inc. ("MIB") is a membership corporation owned by approximately 400 member life and health insurance companies in the United States, Canada and Caribbean region. MIB's core business (known as MIB's Underwriting Services or the MIB Checking Service) is sometimes described as an "information exchange" because MIB members contribute underwriting data (including personal information) about insurance applicants to the MIB database that may be useful to other members that later search the database. Both the contribution and retrieval of personal information to and from MIB are done with the express authorization of the insurance applicant. Please visit https://www.mib.com/facts_about_mib.html for more information about MIB's Underwriting Services. Virtually all MIB member companies use MIB's Underwriting Services.

In addition to MIB's Underwriting Services, MIB and MIB Solutions (wholly-owned subsidiaries of MIB Group, Inc.) also provide ancillary services to subscribing members, as further described below.

Since its establishment in 1902, MIB has been committed to maintaining the confidentiality and security of the information entrusted to it, and to protecting the privacy of the individuals to whom it pertains. This commitment is as important to us today as it was when the organization was founded. MIB complies with applicable privacy and data security (cybersecurity) laws and administers this Consumer Privacy Policy on an enterprise wide basis, covering our parent company, MIB Group, Inc., and our wholly-owned subsidiaries, MIB and MIB Solutions.

Notice to California Consumers

The information that MIB processes in connection with its business is generally exempt from coverage by the California Consumer Privacy Act of 2018, as amended (CCPA):

- For most of the services that MIB provides to its members and customers, MIB acts as a "service provider" to companies (life insurers) that are governed by Gramm-Leach-Bliley Act ("GLBA"). Therefore, the personal information that we receive from our members and customers as a service provider under GLBA is not covered by the CCPA, pursuant to Cal Civ. Code §1798.145(e).[See the Privacy Notice from your insurance company for additional information regarding how insurance companies may use and disclose your personal information.]
- As a consumer reporting agency under the federal Fair Credit Reporting Act for MIB's Underwriting Services, the personal information that we collect from members and consumers for MIB's Underwriting Services, as well as all protected health information that MIB receives as a business associate to its covered entity members under HIPAA is also not covered by the CCPA pursuant to Cal Civ. Code §1798.145(d) and §1798.145(c)(1)(A), respectively.

Despite these exemptions from coverage under the CCPA, MIB is committed to being transparent about the personal information that we collect, use and disclose about individual consumers in the conduct of our business, as disclosed in this Privacy Policy. If you have any questions about the disclosures set forth below, please contact us at privacy@mib.com.

MIB'S UNDERWRITING SERVICES:

MIB member companies report limited information (sometimes described as a "brief report") to MIB that is significant to underwriting an application for life, health, disability income, critical illness or long-term care insurance. The reports, if any, are brief summaries of one or more medical conditions or other conditions (typically hazardous avocations and adverse driving records, as further explained below) that are reported by the member company in a proprietary and highly confidential coded format by other member insurance companies in the underwriting process. Please refer to https://www.mib.com/facts_about_mib.html for additional information about MIB's Underwriting Services.

- **Consumer knowledge & consent.** MIB's members will not search MIB's database or report information about you to MIB without first: (i) providing you with the "MIB Pre-Notice" that explains MIB's role in the underwriting process; and (ii) obtaining a signed authorization from you that names MIB as an information source and allows the member to make a brief report to MIB using MIB's proprietary codes. MIB requires its members to take these steps pursuant to MIB's longstanding General Rules.
- **Categories of personal information we have collected about consumers in the preceding twelve (12) months (with authorization):**
 - Personal identifiers: First name, middle name/initial, last name, gender, birth date, birth place, government ID (SSN, SIN), government ID issue country, insurance policy number, state of residence, zip code, occupation.
 - Insurance policy information: MIB may receive the insurance policy number, type of insurance applied for, as well as the face amount of the policy for which you applied. MIB does not collect or receive any information about whether an insurance policy was actually issued, whether it is in force, who owns the policy or who is the beneficiary; however, for those members who underwrite individual disability income insurance policies and subscribe to MIB's Disability Insurance Records Service (DIRS)(an MIB Underwriting Service), MIB collects the amount of disability income benefits that were applied for and the type and amount of admitted benefits in-force.
 - Medical information: Medical information that is significant to your health or longevity is reported to MIB *in the form of MIB codes*. MIB does not collect, maintain or store medical or paramedical examination reports, attending physician statements, lab test results, x-rays, or any other medical records in its database.
 - Non-medical information: Non-medical information about you that is significant to your longevity is reported to MIB *in the form of MIB codes*. MIB codes provide an alert to members regarding your non-medical history (if any) such as: dangerous hobbies or activities, criminal activity, adverse driving history, occupation status, foreign travel, potential financial alerts, insurance application activity, and data obtained from lists maintained by the U.S. Department of Treasury on "Specially Designated Nationals" (or "blocked persons"), the United Nations Security Council, or Canada's Office of the Superintendent of Financial Institutions (OSFI).
- **Purposes for which personal information is collected:** For all categories of information that is collected for MIB's Underwriting Services, the information will be used in the underwriting process by MIB and its member life or health insurance companies solely to detect and deter insurance fraud, or for the member company to perform compliance activities or quality improvement functions. MIB's members are located in the United States, Canada and the Caribbean region. However, your

information may be sent to (or accessed by) members (or their service providers) in locations outside of US and Canadian boundaries. In addition, MIB may use insurance policy information to help families of deceased consumers locate lost or unknown life insurance policies when they submit requests for MIB Solutions, Inc.'s Policy Locator Service (<https://www.mib.com/pls.html>). MIB may also use de-identified and aggregated insurance policy information for its industry application trends analysis known as MIB's Life Index.

With your valid authorization, MIB may also use personal information derived from MIB's Underwriting Services database for studies that are performed for members to demonstrate the value of MIB's Underwriting Services.

From time to time, MIB also provides reports and prepares studies for the insurance industry utilizing information derived from the MIB Underwriting Services database that has been made non-personally identifiable (i.e., it has been de-identified in accordance with applicable law so no individual can be identified by name or other attributes) and/or aggregated. Because of de-identification, no specific individual's information is (or can be) attributed to him or her, and the de-identified information of many individuals is aggregated and reported as a group. The most prominent example of such a report is the MIB Life Index, which is used as an industry proxy for U.S. insurance application activity and is released monthly to a large nationwide audience. You may rest assured that MIB applies the same safeguards to any personal information that is used to perform these ancillary services in accordance with its mature information security program.

- **Categories of sources of personal information:** MIB collects personal information for its Underwriting Services from the following sources:
 - Government sources: Data obtained from lists maintained by the U.S. Department of Treasury on "Specially Designated Nationals" (or "blocked persons"), the United Nations Security Council, or Canada's Office of the Superintendent of Financial Institutions (OSFI).
 - MIB: A code that is generated by MIB to represent a high frequency of insurance application activity in the previous seven years.
 - Member life and health insurance companies: With the exception of the government sources and the MIB reports listed directly above, MIB receives the information that is used for and incorporated into its information exchange exclusively from its member life and health insurance companies.
- **Categories of recipients of personal information within the past twelve (12) months:**
 - Member life and health insurance companies: With your authorization, MIB shares personal information about you with its member life and health insurance companies (and their service providers who are acting on the member's behalf in the underwriting process, as well as the member's reinsurer(s)).
 - You: MIB discloses personal information to you (or to your authorized recipients), in response to your request for a copy of your MIB Consumer File, as explained below.
 - Law Enforcement/Legal Requests: MIB discloses personal information in response to law enforcement requests and as required by applicable law, court order, subpoena or governmental regulations. Generally, MIB is only permitted to release your consumer file to another third party with your authorization or in response to a federal grand jury subpoena or court order. 15 U.S.C.

Sec. 1681b. However, with respect to investigations relating to terrorism, the Federal Bureau of Investigation ("FBI") and other federal agencies would be allowed access to consumer information at MIB if the FBI could certify that the information would be sought for an investigation to protect against international terrorism or clandestine intelligence activities. Other federal agencies investigating international terrorism might also obtain consumer information, provided they present MIB with a certification that the information would be necessary for the agency's activities. Although MIB is required to release a consumer's information in those circumstances, given the limited nature of the information that MIB actually maintains in its database (i.e., only coded medical information and no financial information), it is extremely unlikely that federal agencies would even request a consumer's MIB file in furtherance of an investigation on international terrorism.

- **Except as stated above, MIB does not and will not sell or disclose your personal information (including the personal information of minors) to any third parties.**
- **Retention of MIB codes.** To help ensure that MIB only reports relevant and timely information about individuals in its database, MIB's reports to members will only include information (for example, MIB codes) that has been furnished to MIB within the prior 7 years (except as prohibited under applicable law), after which MIB codes are removed from MIB Consumer Files.
- **Retention of personal identifiers and insurance policy information.** MIB retains the personal identifiers and insurance policy information described above in order to help families of deceased consumers locate lost or unknown life insurance policies by using MIB Solution's Policy Locator Service (<https://www.mib.com/pls.html>), and for MIB to provide its de-identified and aggregated industry application trends analysis known as the MIB Life Index. MIB also retains the personal identifiers and insurance policy information that was collected by members for MIB's Disability Insurance Records Service (DIRS) for 5 years.
- **Free annual access to MIB Consumer File.** Every consumer is entitled to know the contents of his or her Consumer File maintained by MIB and to correct any inaccurate or incomplete information that is included in the record. Therefore, you may request a free copy of your MIB Consumer File (if any) using MIB's toll-free line, via MIB's website or via the mail. For more information on how to request a copy of your MIB Consumer File from MIB, please visit: http://www.mib.com/request_your_record.html.

If you have a legal guardian or have designated another representative to act on your behalf pursuant to a Power of Attorney, that individual can submit a request for you with appropriate documentation (proof of legal guardianship or Power of Attorney). Please contact infoline@mib.com for additional information.

For your protection, the following categories of information will be collected from you in order to process your request for a copy of your MIB Consumer File:

- Personal identifiers: Your full name (including any past names or aliases you might have used), gender, mailing address, email address, telephone number, date of birth, place of birth, occupation and social security number (or Social Identification Number for Canadian residents).

These personal identifiers will be collected and maintained securely by MIB and will be used solely to process your request for a copy of your MIB Consumer File. **MIB does not and will not sell the personal information that we collect from you (including the**

personal information of minors) to process your request. Specifically, the personal information that you provide to MIB will be used only to verify your identity (which may include the use of a third-party identity verification service), to conduct an accurate search of MIB's master data file and to make a reasonable effort to confirm that the search results (if any) actually relate to you.

- **Reinvestigation rights.** MIB and its member companies are committed to adopting and maintaining procedures that maximize the accuracy, timeliness, and completeness of reports made to MIB. If you believe that your MIB Consumer File is inaccurate or incomplete, you may contact the MIB Disclosure Office and request a reinvestigation with the MIB member that reported the information about you to MIB. For more information on how to request a reinvestigation, please visit: http://www.mib.com/how_to_dispute_your_consumer_file.html.

In order to initiate a reinvestigation, MIB will collect the following categories of personal information you in order to process your request:

- Personal identifiers: Your full name, mailing address, email address, date of birth, place of birth, your Social Security Number or Social Identification Number (Canada).
- Medical and non-medical information: A description of the information in dispute and the specific reasons why you believe the information is inaccurate or incomplete.

All personal information that is collected by MIB for your reinvestigation will be used solely to process your request for a reinvestigation. **MIB does not and will not sell the personal information that we collect from you (including the personal information of minors) to process your request.**

MIB EHR SERVICE

MIB also provides its EHR Service in the United States to certain members who choose to subscribe. MIB's EHR Service is used by members for underwriting life, critical illness and disability income insurance policies, as well as for determining disability benefits eligibility.

With your signed authorization, MIB's EHR Service provides subscribing member life and health insurance companies with electronic copies of your medical records (known as "electronic health records" or "EHR") derived from healthcare organizations and other healthcare providers. MIB obtains your electronic health records from certain participating EHR vendors that also provide services to your healthcare providers ("EHR Vendors").

To learn whether an MIB member company obtained your electronic health records using MIB's EHR Service, please contact the member company to which you applied for insurance.

- **Consumer knowledge & consent.** Members are not authorized to submit search requests to MIB's EHR Service until they have obtained a signed authorization from you that expressly permits the member to request and receive your medical records.
- **Categories of personal information we have collected about consumers in the preceding twelve (12) months (with authorization):** If you signed an authorization with a member company that subscribes to MIB's EHR Service, MIB may have collected the following categories of personal information about you:

- Personal identifiers: First name, last name, date of birth, address, gender, Social Security Number, phone number, email address, insurance policy number.
- Medical information: All medical information that is contained within your electronic health records that are provided by MIB's EHR Vendors.
- Non-medical information: Any non-medical information that is contained within your electronic health records that are provided by MIB's EHR Vendors.
- **Purposes for which personal information is collected:** The personal identifiers that are collected by MIB for MIB's EHR Service will be used solely to process the member's search request(s) for your electronic health records. MIB's member life and health insurance companies may only use the EHRs received from MIB's EHR Service for underwriting their life, critical illness, long term care and disability income insurance policies, as well as for determining eligibility for benefits (as applicable). Members may also report data obtained from your EHR to MIB's Checking Service (see above for more information about MIB's information exchange), all pursuant to your signed authorization.
- **Categories of sources of personal information:** MIB receives personal information about consumers from the following categories of sources:
 - Member life & health insurance companies: Life and health insurance companies that are members of MIB and have subscribed to MIB's EHR Service (including their service providers who are acting on the member's behalf in the underwriting process) provide the personal identifiers listed above to MIB in order to conduct a search using MIB's EHR Service.
 - EHR Vendors: The participating EHR vendors may provide copies of your electronic health records to MIB, for further disclosure to MIB's member life and health insurance companies (and their service providers who are acting on the member's behalf in the underwriting process).
- **Categories of recipients of personal information within the past twelve (12) months:**
 - Member life & health insurance companies: With your authorization, in response to a member's request for your electronic health records, MIB will provide the member company (and its service providers who are acting on the member's behalf in the underwriting process, as well as the member's reinsurer(s)) with copies of your electronic health records (if any) that it obtained from MIB's EHR Vendors.
 - EHR Vendors: In order for MIB to submit an inquiry to the EHR Vendors, MIB provides the personal identifiers identified above for each search inquiry, and receives back your electronic health records (if any).
 - Law Enforcement/Legal Requests: MIB discloses personal information in response to law enforcement requests and as required by applicable law, court order, subpoena or governmental regulations.
 - **Except as stated above, MIB does not and will not sell or disclose your personal information (including the personal information of minors) to any third parties.**

- **Short-term retention of EHRs.** MIB does not retain a copy of your electronic health records for longer than ten (10) days. In those ten (10) days, your electronic health records are retained by MIB solely for processing, debugging and similar administrative purposes. Upon the expiration of such ten (10) day period, your electronic health records are securely destroyed by MIB, but they are retained by the member that requested and received your records (if applicable).
- **Retention of personal information.** MIB retains historical transaction details that may include your name, date of birth and policy number for twelve (12) months. These personal identifiers are retained solely for administrative purposes and are securely destroyed after twelve (12) months.

TRANSUNION'S IDENTITY MANAGER VERIFICATION SERVICES¹

In addition to MIB's Underwriting Services and the EHR Service, MIB also provides subscribing members with access to TransUnion's Identity Manager Verification Service (IDMV) (a service provided by TransUnion Risk and Alternative Data Solutions, Inc., "TRADS") for members' U.S. life insurance applicants. When accessing MIB's services, MIB's members may submit an identity verification inquiry that is passed through to TRADS solely to verify an applicant's identity. By obtaining a TransUnion IDMV report, MIB members verify the identities of their customers in order to ensure the quality of their business, manage identity risk, prevent identity fraud, and comply with their obligations under the USA Patriot Act (anti-money laundering and customer identification programs).²

To learn whether an MIB member company obtained an IDMV report under this program, please contact the member company to which you applied for insurance.

- **Categories of personal information collected about consumers in the preceding twelve (12) months:** In order for a subscribing member to obtain an IDMV report from TRADS, the following information is collected:
 - Personal identifiers: First and last name, date of birth, street address, city, state, zip, country (U.S. only), Social Security Number
- **Purposes for which personal information is collected:** Your personal information is used solely to submit an inquiry to TRADS so that MIB's life and health insurance company members may submit an identity verification inquiry to verify an applicant's identity. MIB's technical platform is used by members to access IDMV reports and MIB "passes through" the IDMV reports (if any) directly to the requesting member (and its service providers who are acting on the member's behalf). TransUnion IDMV reports are used solely for identity verification and cannot be used to determine an individual's eligibility for insurance.
- **Categories of sources of personal information:**
 - Member life & health insurance companies: Life and health insurance companies that are members of MIB and have subscribed to IDMV (including their service providers who are acting on the member's behalf) provide the personal identifiers listed above in order to conduct an IDMV search.
 - TRADS: In response to a member's search inquiry, TRADS provides an identity verification report to MIB to be passed-through to subscribing members. The identity verification report includes personal information, as well as potential fraud alerts, as described above.

- **Categories of recipients of personal information within the past twelve (12) months:**
 - Member life & health insurance companies: In response to a member’s request for IDMV report, MIB “passes through” the IDMV reports (if any) directly to the requesting member (including their service providers who are acting on the member’s behalf).
 - TRADS: In order for a member to submit an IDMV inquiry to TRADS, members must provide the personal identifiers listed above to TRADS through MIB’s technical platform and will receive back an IDMV report.
 - Law Enforcement/Legal Requests: MIB discloses personal information in response to law enforcement requests and as required by applicable law, court order, subpoena or governmental regulations.
 - **Except as stated above, MIB does not and will not sell or disclose your personal information (including the personal information of minors) to any third parties.**
- **Short-term Retention.** MIB retains the IDMV search inquiry and response data for administrative purposes for no longer than 60 days, after which the information is securely destroyed. MIB does not otherwise retain a copy of the IDMV report, make a record of the identity verification inquiry for your MIB Consumer File or incorporate the identity verification report contents into your MIB Consumer File.

SHERLOCK REPORTS³

MIB also provides subscribing life and health insurance company members in the United States with access to Sherlock reports (“Sherlock Reports”) (a service provided by Explore Information Services, LLC (“Explore”). Sherlock Reports are used by MIB’s members to identify an individual’s criminal record history (if any).

To learn whether an MIB member company obtained a Sherlock Report under this program, please contact the member company to which you applied for insurance, or you can request a copy of your Sherlock consumer file by contacting Explore at the email address or phone number provided below.

- **Categories of personal information collected about consumers in the preceding twelve (12) months:**

In order for a subscribing member to obtain a Sherlock Report from Explore, the following information is collected:

- Personal identifiers: First, middle and last name, date of birth, street address, city, state, zip.
 - Non-medical information: The Sherlock Reports that are received from Explore also include criminal history information (including criminal records and past convictions)(if any).
- **Purposes for which personal information is collected:** Your personal information is used solely to submit an inquiry to Explore so that MIB’s subscribing life and health insurance company members may obtain a Sherlock Report. MIB’s technical platform is used by members to access Sherlock

Reports and MIB “passes through” the Sherlock Reports (if any) directly to the requesting member. Members use the Sherlock Reports to collect criminal history information on individuals who are applying for a life or health insurance policy in the United States. Members use the Sherlock Reports to help determine eligibility for insurance.

- **Categories of sources of personal information:**
 - Member life & health insurance companies: Life and health insurance companies that are members of MIB and have subscribed to Sherlock (including their service providers who are acting on the member’s behalf) provide the personal identifiers listed above in order to conduct a search.
 - Explore: In response to a member’s search inquiry, Explore provides Sherlock Reports to MIB to be passed-through to members. Sherlock Reports include personal information, including criminal history information, as described above.

- **Categories of recipients of personal information within the past twelve (12) months:**
 - Member life & health insurance companies: In response to a member’s request for a Sherlock Report, MIB “passes through” the Sherlock Reports (if any) directly to the requesting member (including their service providers who are acting on the member’s behalf in the underwriting process, as well as the member’s reinsurer(s)).
 - Explore: In order for a member to submit an inquiry to Explore, members must provide the personal identifiers listed above through MIB’s technical platform to Explore and members will receive back a Sherlock Report.
 - Law Enforcement/Legal Requests: MIB discloses personal information in response to law enforcement requests and as required by applicable law, court order, subpoena or governmental regulations.
 - **Except as stated above, MIB does not and will not sell or disclose your personal information (including the personal information of minors) to any third parties.**

- **Short-term Retention.** MIB retains the Sherlock search inquiry and response data for administrative purposes for no longer than 60 days, after which the information is securely destroyed. MIB does not otherwise retain a copy of the Sherlock Report or view its contents.

- **Rights of Access and Dispute.** Explore is a “consumer reporting agency” under the federal Fair Credit Reporting Act. Therefore, in order to request a copy of your Sherlock consumer file or to dispute the contents of your Sherlock consumer file (if one exists), you may contact Explore at: explore.info@exploredata.com or 1-888-888-0236.

MVR Indicator⁴

MIB also provides some of its U.S. member life and health insurance companies with access to MVR Indicator reports (a service provided by ISO Claims Services, Inc. through its Insurance Information Exchange Unit (“iX”). The MVR Indicator provides an alert to insurers that indicates whether a proposed

insured has a record of motor vehicle violations. This alert helps insurers decide whether to order motor vehicle records on the proposed insured.

To learn whether an MIB member company obtained an MVR Indicator report under this program, please contact the member company to which you applied for insurance.

- **Categories of personal information collected about consumers in the preceding twelve (12) months:** In order for a subscribing member to obtain an MVR Indicator report from iiX, the following information is collected:
 - Personal identifiers: First, middle and last name, date of birth, driver's license state and driver's license number.
- **Purposes for which personal information is collected:** Your personal information is used solely to submit an inquiry to iiX. MIB's technical platform is used by members to access MVR Indicator reports and MIB "passes through" the MVR Indicator reports (if any) directly to the requesting member (and its service providers who are acting on the member's behalf). MVR Indicator reports are used solely as an alert for triaging cases through the underwriting process and for no other purposes.
- **Categories of sources of personal information:**
 - Member life & health insurance companies: Life and health insurance companies that are members of MIB and have subscribed to MVR Indicator (including their service providers who are acting on the member's behalf) provide the personal identifiers listed above in order to conduct an MVR Indicator search.
 - iiX: In response to a member's search inquiry, iiX provides an MVR Indicator report to MIB to be passed-through to subscribing members. The MVR Indicator report includes personal information, as well as MVR alerts (if any), as described above.
- **Categories of recipients of personal information within the past twelve (12) months:**
 - Member life & health insurance companies: In response to a member's request for an MVR Indicator report, MIB "passes through" the MVR Indicator reports (if any) directly to the requesting member (including their service providers who are acting on the member's behalf).
 - iiX: In order for a member to submit an MVR Indicator inquiry to iiX, members must provide the personal identifiers listed above to iiX through MIB's technical platform and will receive back an MVR Indicator report.
 - Law Enforcement/Legal Requests: MIB discloses personal information in response to law enforcement requests and as required by applicable law, court order, subpoena or governmental regulations.
 - **Except as stated above, MIB does not and will not sell or disclose your personal information (including the personal information of minors) to any third parties.**
- **Short-term Retention.** MIB retains the MVR Indicator search inquiry and response data for administrative purposes for no longer than 60 days, after which the information is securely

destroyed. MIB does not otherwise retain a copy of the MVR Indicator report, make a record of the inquiry for your MIB Consumer File or incorporate the MVR Indicator report contents into your MIB Consumer File.

Cross Check Service

Life insurers are required in several states to search the Social Security Death Master File (“SSDMF”) to determine whether any of their insureds may have died without any subsequent notification to the life insurance companies. MIB Solutions’ Cross Check Service assists subscribers with their efforts to match (“cross check”) certain life insurance policy, retained asset account, contract and annuity records with the latest updated version of the SSDMF as well as MIB’s other death sources (“Other Death Sources”), and to obtain a report with detailed results of the data match. Once MIB Solutions conducts the cross-check against the SSDMF and the Other Death Sources, it provides a report to the company identifying matches. Both the SSDMF and the Other Death Source records (public obituary records) are downloaded files that are maintained and stored by MIB. The member is then responsible for discharging its reporting duties to state insurance departments and for conducting a search for the deceased insured’s family and/or beneficiary.

- **Categories of personal information we have collected about consumers in the preceding twelve (12) months:**
 - Personal identifiers: first, middle, last name; date of birth; social security number

- **Purposes for which personal information is collected:** Personal information is collected by MIB solely to cross check certain life insurance policy, retained asset account, contract and annuity records with the latest updated version of the SSDMF as well as MIB’s Other Death Sources, and to provide a report to subscribing life insurance companies.

- **Categories of sources of personal information:**
 - Subscribing life insurance companies: Those life insurance companies that subscribe to MIB’s Cross Check Services provide personal information to MIB in order for MIB to perform its services.

- **Categories of recipients of personal information within the past twelve (12) months:**
 - Subscribing life insurance companies: Those life insurance companies that subscribe to MIB’s Cross Check Services receive personal information from MIB via Cross Check deliverables.
 - Law Enforcement/Legal Requests: MIB discloses personal information in response to law enforcement requests and as required by applicable law, court order, subpoena or governmental regulations.

- **Except as set forth above, MIB does not and will not sell or disclose your personal information (including the personal information of minors) to any third parties.**

Policy Locator Service

MIB offers its Policy Locator Service (“PLS”) to consumers in order to potentially locate “lost life insurance policies” (policies that are suspected to exist, but are unknown to the decedent’s estate representative). Executors or administrators of a decedent's estate are permitted to order a report of life insurance application activity from MIB. If no executor or administrator has been appointed, then a surviving spouse or the decedent's closest surviving relative may be eligible to order a Policy Locator Service report. For additional information about this service, please visit: <https://www.mib.com/pls.html>.

PLS IS NOT AVAILABLE TO CONSUMERS WHO ARE RESIDENTS OF CALIFORNIA OR WHERE THE DECEDENT ABOUT WHOM A SEARCH IS REQUESTED WAS A RESIDENT OF CALIFORNIA.

- **Categories of personal information we have collected about consumers in the preceding twelve (12) months:**
 - Personal Identifiers: For the requesting consumer, we collect full name, address, zip code, phone number and email address. For the decedent, we collect full name, date of birth, place of birth, last residence and any aliases.
- **Purposes for which personal information is collected:** Personal information is collected solely to process your request for a PLS report.
- **Categories of sources of personal information:**
 - MIB: MIB accesses its own Insurance Activity Index database to determine whether the decedent may have applied for insurance at MIB member companies since 1996.
- **Categories of recipients of personal information within the past twelve (12) months:**
 - You: MIB only provides the PLS report to you in response to your request for a report.
 - **MIB does not and will not sell or disclose your personal information or the personal information of the decedent (including the personal information of minors) to any third parties.**

Life Statistical Services

As the appointed statistical agent for the New York Department of Financial Services (NYDFS) and the Kansas Insurance Department (KID)(through 2019 only), MIB Solutions assists regulated insurance companies with their compliance obligations for mandatory experience reporting as required by state insurance departments.

- **Categories of personal information we have collected about consumers in the preceding twelve (12) months:**

- Personal identifiers: insurance policy number, gender, date of birth, age information, state of domicile
- Insurance policy information: MIB may receive the insurance policy number, state of policy issue, preferred class status, policy type, face amount, death claim amount (if any), termination date, premium information, account value information, guarantee status.
- Medical information: smoker status
- **Purposes for which personal information is collected:** Personal information may be collected by MIB solely to perform its obligations as the appointed statistical agent for NYDFS and KID. As the statistical agent, MIB provides a report to the regulated life insurance companies as well as to NYDFS and/or KID, as applicable.
- **Categories of sources of personal information:**
 - Regulated life insurance companies: Those life insurance companies that are subject to the NYDFS and/or KID data calls are required to provide information to MIB in order to meet their compliance obligations for mandatory experience reporting with the applicable state insurance departments.
- **Categories of recipients of personal information within the past twelve (12) months:**
 - Specific state insurance departments: MIB only provides the experience reports that it creates as statistical agent to NYDFS and/or KID, depending on which insurance department regulates your life insurance company (if any).
 - Law Enforcement/Legal Requests: MIB discloses personal information in response to law enforcement requests and as required by applicable law, court order, subpoena or governmental regulations.
 - **Except as set forth above, MIB does not and will not sell or disclose your personal information (including the personal information of minors) to any third parties.**

Safeguards for Personal Information

MIB implements and enforces robust security standards and policies through its Enterprise Security Program that are designed to protect the security, integrity and confidentiality of any personal information. MIB is committed to safeguarding any personal information that it collects and/or maintains to reduce the risk of unauthorized disclosure, modification, or destruction, whether accidental or intentional. To accomplish this, MIB employs administrative, physical and technical safeguards that comply with applicable laws.

Website Accessibility

MIB is committed to facilitating the accessibility and usability of its website, www.mib.com, for people with disabilities. MIB is currently in the process of implementing the relevant portions of the World Wide Web Consortium's Web Content Accessibility Guidelines 2.0 Level AA ("WCAG 2.0 AA") or other

standards to the extent required by the Americans with Disabilities Act ("ADA"). If, at any time, you have specific questions or concerns about the accessibility of this Consumer Privacy Policy or any other page linked on our website, please contact us at infoline@mib.com or leave a voice message at **1-866-692-6901**.

Non-Discrimination

You have a right not to receive discriminatory treatment by MIB when you exercise your privacy rights, and MIB is fully committed to this non-discrimination policy.

Scope of Consumer Privacy Policy and Future Changes

Although MIB has long adhered to the principles described in this policy, MIB reserves the right to modify its Consumer Privacy Policy with a new, updated policy at any time. This policy is provided for informational purposes only and the principles set forth in this policy do not create any contractual obligations or terms with, or confer any warranties to, any individual. If you have any questions or concerns about MIB's Consumer Privacy Policy, please e-mail us at: privacy@mib.com.

Last updated: June 15, 2020

¹TransUnion Identity Manager Verification Services (IDMV) is a service provided by TransUnion Risk and Alternative Data Solutions, Inc.

²Under applicable privacy laws, MIB members may disclose your personal information to service providers like MIB and TRADS for numerous servicing purposes, subject to prohibitions on reuse and redisclosure. Please consult your insurance company's privacy notice for additional information.

³Sherlock is a service provided by Explore Information Services, LLC, a Solera company.

⁴MVR Indicator is a service provided by ISO Claims Services, Inc. through its Insurance Information Exchange Unit (known as iiX).