

GARDNER & WHITE PRIVACY POLICY

For over 46 years, respecting and protecting customer privacy has been vital to Gardner & White's and our affiliated companies' success. By explaining our Privacy Policy to you, we want you to better understand how we keep our customer information private and secure while using it to serve you better. We believe that you should know about the information we collect, the measures we take to safeguard it and the situations in which we might share information with others.

Collection of Information

We must collect a certain amount of information to provide customer service, offer new products or services, evaluate benefits and claims, assist in the administration of customer plans, and fulfill legal and regulatory requirements. The information we collect and the extent to which we use it will vary depending on the product or service involved. Examples include:

- ❖ Information on your application and related forms, such as name, address, date of birth, Employer Identification Number, Social Security Number, gender, marital status, dependents, assets, income, and investment option elections;
- ❖ Information about business conducted between us, such as products or services purchased, account balances, payment history and claims history;
- ❖ Information provided by your employer or benefits plan sponsor regarding any group product you may have, such as name, address, Social Security Number, age, income and marital status.
- ❖ Information from other sources, such as motor vehicle reports, medical information and demographic information; and
- ❖ Information from visitors to our Web sites, such as that provided through online forms, site visit data and online information-collecting devices known as "cookies." Cookies enable the site to "remember" who you are so you can navigate the site more easily. They also permit you to access secured information and conduct secure transactions. We do not record personal or sensitive information in our cookies.

Sharing and Use of Information

While acknowledging the importance of protecting customer information, we may find it necessary in the course of conducting business to disclose information we collect about you, as described above, in some or all of the following circumstances:

- ❖ Information may be shared with our affiliates to enable them to provide customer service or account maintenance.
- ❖ Information may be shared with non-affiliated third parties (as permitted by law) who are assisting us by performing services or functions on our behalf, such as administrators and service providers, agents, brokers, brokerage firms, insurance companies and mutual fund vendors.
- ❖ Information may be shared with other financial service companies, such as banks, insurance companies, investment advisory service and asset management firms, mutual fund vendors, and securities brokers or dealers, with whom we have written joint marketing or selling agreements.
- ❖ Information may be shared with non-affiliated third parties as permitted or required by law, such as compliance with a subpoena, fraud prevention or compliance with an inquiry from a government agency or regulator.
- ❖ Personal health information will be shared only with proper written authorization or as required by law. We will not share medical information or motor vehicle accident reports for marketing purposes.
- ❖ Information may be shared with our affiliates so they may tell you about other products or services offered that might be useful or beneficial to you.

From time to time, we enter into agreements with other companies to provide services to us or to make products and services available to you. Under these agreements, the companies may receive information about you but they must safeguard this information and they may not use it for any other purposes.

Protecting the Information

We are committed to uphold our pledge to maintaining the security of our customers' personal information and we take our responsibility to protect the confidentiality and security of customer information very seriously. To ensure that such information is used only in the manner we have described in this policy, we have instituted the following safeguards:

- ❖ Employees, investment advisor representatives and registered representatives are required to comply with our established privacy policies and procedures, which exist to protect the confidentiality of customer information. Any employee, investment advisor representative or registered representative who violates our privacy policies will be subject to a disciplinary process.
- ❖ Employees access the information only on a business need-to-know basis, such as to pay benefits or claims, assist in the administration of a customer's plan or service a customer request.
- ❖ We use electronic, physical and procedural safeguards to maintain the confidentiality of the information we collect and to guard against unauthorized access, alteration or destruction. Such methods include locked files, user authentication and passwords, and encryption and firewall technology.

Review and Access to Your Information

If required by law and upon written request, we will make information from your file available for your review. We are unable to provide information collected in connection with, or in anticipation of, any claim or lawsuit or any medical information we have obtained from a health care provider.

If you notify Gardner & White that any information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which will be included in any future disclosure of information.

If you have any questions about the right of access or wish access to your file (as permitted by law), please contact us at the address below and include a copy of your personal identification, such as a driver's license or photo identification:

**Privacy Official
Gardner & White
P.O. Box 40948
Indianapolis, IN 46240-0948**

Our Continuing Commitment

We will provide our Privacy Policy to all new customers. We will continue to provide this notice as frequently as required by law and will notify existing customers of any modification at least annually.

We will continue to follow the policies set forth in this notice even when a customer relationship no longer exists. However, that party will no longer be entitled to an annual notice.

This notice is being provided on behalf of the following Gardner & White affiliates and affiliated sales offices:

Gardner & White Corporation
Gardner & White, Inc.
Gardner & White Holding Company, Inc.
G & W Equity Sales, Inc.
United Advisors Healthcare, Inc.

Mandel & Associates, Inc.
S.A. Bogenrief & Associates, LLC

Our privacy commitment to you also extends to those companies with which we affiliate in the next 12 months. While this Privacy Policy may change from time to time, you can always review our current policy online at Gardner & White's website, ***www.gardnerwhite.com***.

Rev 2/2010

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GARDNER & WHITE PRIVACY OPT OUT NOTICE

If you prefer that Gardner & White not disclose information about you to nonaffiliated parties, you may opt out of these disclosures. This opt out will not apply to disclosures permitted by law or to or to our affiliates or to companies that perform services on our behalf or to other financial services institutions with whom we have a joint marketing agreement. If you wish to opt out of disclosures to parties that are not affiliated with Gardner & White, you may select one of the following methods to exercise this right:

Call us at 317-581-1580 or 800-347-5737; or

Complete the form below and mail to:

Privacy Official; Gardner & White, P.O. Box 40948,
Indianapolis, IN 46240-0948

OPT OUT RESPONSE FORM

NAME _____

(Anyone listed on the account or contract may elect to opt out on the account or contract on behalf of all account or contract holders)

**ACCOUNT OR CONTRACT
NUMBER** _____

**Please list any additional account or contract numbers for
which the opt out will apply**

- _____
- _____
- _____
- All accounts or contracts on which I am listed.**

SIGNATURE _____ **DATE** _____