



## ProBen Privacy Policy

At Professional Benefits Solutions (ProBen) maintaining our customers' trust and confidence is of paramount importance. We are committed to safeguarding your personal information and providing you with facts and options about how this information may be shared. Please read this notice to learn more about our privacy policies.

This notice describes the privacy policies of ProBen. The privacy policies apply to individuals who obtain or apply for a financial product or service for personal, family, or household purposes, or have done so in the past.

### Our Privacy Principles:

- We do not sell customer information.
- We do not provide customer information to persons or entities outside of the ProBen family who are doing business for their own marketing purposes.
- We contractually require any persons or entities outside of the ProBen family that provide products or services to customers on our behalf to protect the confidentiality of customer information.
- We afford prospective customers and former customers the same protections as existing customers in regard to the use of personal information.

If you are satisfied with the way that your personal information is collected and shared you do not need to take any action at this time. This notice may be amended at any time. We will provide you with annual reminders of our policies and with revised policies if there are any changes in how we handle your personal information. If you have any questions about this privacy policy you may call our Director of Client Service, Lauren Landau, at (301) 369-2379.

### I. Information That We Collect

As part of providing you with our services we obtain nonpublic personal information about you, which may include the following:

- Information we receive from you on applications, questionnaires, subscription documents or other forms including name, address, social security number, assets and income.
- Information about your transactions with us, our affiliates, or others, such as balances, payment history, parties to transactions and account usage.
- Information about you from other affiliates, credit reporting agencies and other third parties, such as your creditworthiness, credit history and other information.

### II. Information That We Share

We use or share information in a limited and carefully controlled manner. We use or share your information in order to identify and protect you against fraud, enable us to complete transactions quickly and efficiently, determine the right services to meet your needs and to provide you with proper customer service. Examples of customer information that we may share include:

- Information we receive from you, such as your name, address, social security number, assets, and income, as provided, for example on subscription documents or account applications.
- Information about your transactions with us, our affiliates, and others, such as balances, payment history, parties to transactions, and account usage.
- Information we receive from affiliates, credit reporting agencies and other third parties not affiliated with us, such as your creditworthiness and credit history.

Depending on the type of relationship you have with ProBen, we may share information with other affiliates, as well as with unaffiliated third parties.

**A. Sharing Information With ProBen Affiliates.**

We share information about you with affiliates, as permitted by law, in order to provide you with as many financial tools as possible. We may share identification information and transaction experience with affiliates. We may share experience and non-experience nonpublic personal information about you to affiliates.

**B. Sharing Information With Third Parties Not Affiliated With ProBen.**

We disclose information with unaffiliated third parties as required or permitted by law. Please be assured that whatever the reason for sharing your personal information, we take steps to assure that those parties respect your privacy by limiting the use of the information to the purpose for which it was disclosed. These unaffiliated third parties may include:

- Companies that perform services to your account that we do not provide ourselves. Such services may include account valuation, preparation of account statements, 5500's, determination of fees and printing services.
- Companies that will help protect your account from fraud.
- Companies that provide services necessary to effect a transaction that you request or to service your account.
- Government agencies, courts, parties to lawsuits, or regulators in response to subpoenas. In such cases, we share only the information that we are required or authorized to share.

**III. Confidentiality and Security**

The security of your account information is important to us. Only those persons who need your information to perform their job have access to it. In addition, we maintain physical, electronic and procedural security measures that comply with federal regulations to protect your information.

Our employees have limited access to your personal information based upon their responsibilities. All employees are instructed to protect the confidentiality of your personal information as described in these policies, which are strictly enforced.

**IV. Former Customers**

If you end your relationship with ProBen, we will continue to adhere to the policies and practices described in this notice.