

G·T·L
MEMORANDUM

DATE: April 25 2001
TO: All Agents Appointed by Guarantee Trust Life Insurance Company
FROM: Guarantee Trust Life Insurance Company
RE: Compliance with the Gramm-Leach-Bliley Act (GLBA) and Privacy Notice Requirements

The purpose of this memo is to address the Privacy Notice obligations of Guarantee Trust Life Insurance Company (GTL) and agents appointed by GTL to solicit its insurance products. These obligations apply to joint venture agencies (*i.e. Cornerstone, Seniors First, and Century Senior Services*), as well as individually appointed agents.

Effective as of July 1, 2001, all "licensees" are required to be in compliance with GLBA. As you know, one of the requirements under GLBA is for a "licensee" to provide notice to a customer about its privacy practices and, if applicable, provide the customer with a right to opt-out of having any of their nonpublic personal information shared with nonaffiliated third parties, except those permitted by law.

The NAIC Model *Privacy of Consumer Financial and Health Information Regulation*, defines "licensee" in the following context:

"Licensee" means all licensed insurers, producers and other persons licensed or required to be licensed, or authorized or required to be authorized, or registered or required to be registered pursuant to the Insurance Law of this state."

Therefore, an agent soliciting insurance is deemed to be a licensee. However, an agent will not be subject to providing notice and opt-out as long as he or she is acting in the capacity of an employee, agent, or other representative of another licensee ("the principal") and:

1. The principal (*i.e.* GTL) otherwise complies with, and provides the notices required; and
2. The licensee (*i.e.* the agent) does not disclose any nonpublic personal information to any person other than the principal (GTL) or its affiliates in a manner permitted by state Privacy regulations.

IMPORTANT – PLEASE READ CAREFULLY!

Where an agent writes an application for insurance coverage with GTL, GTL will provide its own Privacy Notice as part of the issued policy package to the policyholder. The agent will not be responsible for providing the customer with any other Privacy Notice, except as outlined below.

It is natural to assume that by establishing the agent / policyholder relationship, an agent may retain his/her own records which may include some nonpublic personal information with regard to a policyholder. However, if an agent wishes to use such nonpublic personal information for any purpose other than solicitation or administration of such insurance with GTL, it is incumbent upon that agent to provide the customer with his/her own privacy notice at time of application (*including the customer's right to opt-out of any information sharing.*) *

**Please note that nonpublic personal information may be retained for purposes of applying for other products or services of a personal, family or household nature offered by other financial or insurance companies. This practice is allowable only to the extent that such nonpublic personal information becomes subject to the Privacy practices of such other financial or insurance companies.*

A copy of GTL's Privacy Notice is attached for your reference.

At GTL, we are very appreciative of the sales efforts made on our behalf and look forward to a long and mutually successful relationship.

As always, please do not hesitate to contact us should you have any question with regard to this memo.

GTL/tat
Attachment

**GUARANTEE TRUST LIFE INSURANCE COMPANY
PRIVACY NOTICE**

At Guarantee Trust Life Insurance Company (GTL) we know the importance of an individual's right to privacy. That's why protecting the information that personally identifies you, our valued policyholder, is high priority and a matter we take very seriously.

Our primary goal is, and will continue to be, providing you with competitive, fairly-priced, and exceptional quality insurance products to meet the long-term financial needs of you and your loved ones. From life insurance to health insurance, getting you the protection you need is not just a job to us. It is a privilege.

While the personal, financial and medical information you share with us (from applying for coverage, to filing a claim) is the cornerstone to providing you with the high-quality insurance protection and service you've come to know and expect, we want to assure you that information, unique to you, is kept secure, confidential and used expressly for the purpose of conducting our insurance relationship with you. Remember, protecting your privacy is not only our priority...it's our promise to you.

The following is a summary of our privacy policy and practices. It tells you about the kinds of personally identifiable information we collect, disclose or share with others.

INFORMATION WE COLLECT AND SOURCES OF INFORMATION

In order for GTL to provide and administer the insurance products we offer, we collect personal information about you. Some of the information we collect about you is "nonpublic". The nonpublic personal information we collect is obtained from the following sources:

- Information we receive from you on your application for insurance or other forms (*such as your name, address, telephone number, age, social security number, and beneficiary designation.*)
- Information about your transactions with us and our affiliates (*such as the type of insurance product you buy, the premium you pay, the method of purchase, and your payment history.*)
- Information we receive from third party reports, (*such as consumer-reporting/credit agencies, motor vehicle records, and medical information. All medical information we receive is subject to the Medical Confidentiality rules described below.*)

INFORMATION WE DISCLOSE

GTL does not disclose any nonpublic personal information about our policyholders or former policyholders to anyone, except as permitted or required by law.

We may also disclose all of the information we collect, as described above, with the following:

- Affiliates – We may share information with our affiliates. Our affiliates offer products and services that may complement your insurance purchase and we believe may be of interest to you.
- Service Providers – We may share information with companies engaged to perform services on our behalf, such as third party administrators and vendors hired to effect, administer or enforce a transaction that you request or authorize; to develop or maintain computer software; or to perform market research.
- Joint Marketing – We may share information with companies that perform marketing services on our behalf or to other financial institutions with which we have a joint marketing agreement.

MEDICAL CONFIDENTIALITY

Your medical information is kept confidential. We will not use or share, internally or with third parties, your medical information except for the purposes of:

- Underwriting;
- Administering your policy or claim;
- As permitted or required by law; or
- As authorized by you.

SECURITY AND CONFIDENTIALITY OF YOUR INFORMATION

We restrict access to nonpublic personal information about you to those employees (or people working on our behalf under confidentiality agreements) who need to know the information in order to provide products and services to you. We also maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

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Guarantee Trust Life Insurance Company
1275 Milwaukee Avenue
Glenview, Illinois 60025
1-800-338-7452