



Protecting your private information is important to OCI Insurance & Financial Services, Inc (“OCI”) and our employees. We want you to understand what information we collect and how we use it. In order to provide our customers with a broad range of products and services as effectively and conveniently as possible, we use technology to manage and maintain customer information. The following policy serves as a standard for all OCI employees for collection, use, retention, and security of nonpublic personal information.

COLLECTION OF INFORMATION

OCI may be required to collect nonpublic personal financial information about you from some or all of the following sources:

- Information provided by you on applications, new account forms and factfinding questionnaires.
- Transactions executed through OCI, our affiliates, and other providers with whom we are contracted with and serve as providers, vendors or other parties, deemed necessary to deliver services to you;
- Information from non-affiliated third parties, including, but not limited to consumer reporting agencies;
- Affiliated and unaffiliated product sponsors with whom we have selling agreements in place and/or whose products you currently own.

DISCLOSURE OF INFORMATION

OCI is permitted, under law, to disclose nonpublic personal information about you to other third parties in certain circumstances. For example, we may disclose nonpublic personal information about you to third parties to assist us in servicing your policies or accounts, to government entities in response to subpoenas, and to credit bureaus. We do not disclose any nonpublic personal information about you to anyone, except as permitted by law.

Generally, OCI may disclose customer nonpublic personal information to affiliates and non-affiliated third parties that provide services to us or have contracts with us that supply the products and services requested by you.

Examples of parties with whom OCI may share your information include:

- Insurance companies, mutual fund companies, insurance support organizations, and other product sponsors to affect purchases and sales and allow for the servicing of your account;
- Your advisor, broker/dealer, or affiliated financial institutions as permitted by law;
- Clearing agencies through whom we clear and settle securities transactions;
- Third party investment advisory firms with whom we have relationships for the management of customer advisory accounts;
- Businesses, such as banks and other financial institutions with whom we have an agreement in place for the marketing and sale of products and services and which you are associated and were directly involved in enlisting our company to provide our services as requested by you.
- Regulatory or law-enforcement authorities as required by law;and
- Recordkeeping companies

PROTECTION OF INFORMATION

We have security practices and procedures in place to prevent unauthorized use or access to your nonpublic personal information. Your information is only available to those requiring access to process or service your transactions with us, and those fulfilling compliance, legal or audit functions on our behalf. We maintain physical, electronic and procedural safeguards to ensure the protection of your nonpublic personal information in accordance with state and federal privacy regulations.