



Western Growers Financial Services PROTECTING YOUR PRIVACY

This notice is required by law. It tells how we handle nonpublic personal information.

This notice applies to:

- **People who own or apply for our products or services for personal use.**
- **Employee benefit plan participants and beneficiaries.**

Please note that in this notice, “you” refers to only these people. The notice does not apply to an employer plan sponsor or group policyholder.

WE PROTECT NONPUBLIC PERSONAL INFORMATION WE COLLECT ABOUT YOU

We maintain physical, electronic, and procedural safeguards that meet or exceed industry standards to guard your nonpublic personal information. We make sure that the technology we use is always up to date to achieve the best possible protection at any given time.

Our employees and third party service providers have access to your nonpublic personal information only on a “need to know” basis. We conduct regular internal audits of our business practices and procedures, examining confidentiality standards and information access in order to protect your personal information.

HOW WE COLLECT NONPUBLIC PERSONAL INFORMATION

We collect data about you as we do business with you. Some of the sources of this data are as follows:

- **Information we obtain when you apply or enroll for products or services.** You may provide facts such as your name, address, Social Security number, financial status and, when applicable, health history.
- **Information we obtain from others.** This may include claim reports, medical records, credit reports and similar data.
- **Information we obtain through our transactions and experience with you. This includes your claims history, payment and investment records, and account values.**
- **Information we obtain through the Internet.** This includes data from online forms you complete. It also may include data we receive when you visit our website (currently we do not collect any data).

NONPUBLIC MEDICAL INFORMATION

We do not share nonpublic medical information within Western Growers, Western Growers Financial Services and Western Growers Insurance Services or with others except:

- **When needed to service your policies, accounts, claims or contracts;**
- **When laws protecting your privacy permit it; or**
- **When you consent.**

ACCURACY OF INFORMATION

We strive for accurate records. Please tell us if you receive any incorrect materials from us. We take measures to ensure that your nonpublic personal information is accurate and up-to-date. You can also update certain nonpublic personal information that we collect about you. To update your mailing address or your home or work phone numbers, please contact your Investment Professional or write to us at:

**Western Growers Financial Services
17620 Fitch Street
Irvine, California 92614**

In your communication, please include your account number(s), your old information, and the new information that you want updated.

HOW WE SHARE NONPUBLIC PERSONAL INFORMATION

Within Western Growers, Western Growers Financial Services and Western Growers Insurance Services

We may share nonpublic personal information about you or about former customers, plan participants or beneficiaries within Western Growers, Western Growers Financial Services, Western Growers Financial Services Board of Directors and Western Growers Insurance Services for several reasons, including:

- **To assist us in providing service;**
- **To help design and improve products; and**
- **To offer products and services that may be of interest to you.**

With Others

In the course of doing business we may share data with others. This could include nonpublic personal information about you or about former customers, plan participants or beneficiaries. Nonpublic personal information may be shared with others for the following reasons:

- **In response to a subpoena;**
- **To prevent fraud;**
- **To comply with inquiries from government agencies or other regulators; or**
- **For other legal purposes.**

We also may share nonpublic personal information:

- **With others that service your accounts or who perform services on our behalf;**
- **With others with whom we may have joint marketing agreements, including financial services companies (such as other insurance companies, banks or mutual fund companies); and**
- **With other companies with your consent, at your request or as allowed by law.**

Your rights to opt out of disclosure and how you can exercise them.

The law allows you to “opt out” of our sharing nonpublic personal information about you in certain circumstances with affiliated and nonaffiliated companies; that is, you may direct us to not make such disclosures. **We do not currently share information about you with any affiliate or third party that triggers this opt out right.** Therefore, there is no need for you to opt out. If in the future we desire to disclose your information in a way that is inconsistent with this policy, we will notify you in advance and provide you with the opportunity to opt out of such disclosure.

MORE INFORMATION

You can write to us if you have questions about our privacy notice. Please contact our privacy officer at:

Western Growers Financial Services
17620 Fitch Street
Irvine, California 92614
(888) 737-8483

Receipt of this notice does not mean your application or account has been accepted.

We may change our privacy practices at times. We will give you a revised notice when required by law.

Although we maintain processes to keep all accounts updated with current information, it is your responsibility to keep your personal information updated at all times.

Our privacy practices comply with all applicable laws. If a state’s privacy laws are more restrictive than those stated in this notice, we comply with those laws.