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Privacy Statement

Sammons Financial® and Sammons® Financial Group (SFG) value the privacy of our customers, agents, and website visitors. This Privacy Policy describes how SFG and its Member Companies (Member Companies include Midland National® Life Insurance Company, North American Company for Life and Health Insurance®, Sammons Institutional Group®, Inc., and Beacon Capital ManagementSM) collect, use, protect and manage information associated with personal data and what rights you have regarding this activity. If you do not agree with the terms within this Privacy Policy, then you should not access or use the Services, Websites, or any other aspect of SFG business.

This Privacy Policy applies to SFG only, and does not apply to third parties that integrate with the services through SFG or third party products, services or businesses who provide services under their own terms of use and privacy policy. When linking to any third-party site or features, our Privacy Policy no longer applies and you must read the terms of use, terms of service, and privacy policy of the third-party to see how your personal information will be handled on their website(s).

SFG reserves the right to modify this Privacy Policy from time to time to reflect our current practices and ensure compliance with applicable laws. We will revise the "Last Updated" date at the top of this policy when material changes are posted. We recommend that you check this page periodically to stay informed of any changes.

Your Privacy Rights

In certain states, you have the following rights: (1) to request SFG disclose Personal Data we may have collected about you in the 12-month period prior to your request; (2) to request that any incomplete or inaccurate personal data be corrected; and (3) to request how your personal data is used, and, if applicable, shared.

Notice at Collection

SFG complies with state privacy laws such as the California Consumer Privacy Act of 2018 and all related amendments and regulations ("CCPA"). Consumers or their designated authorized agent may make a request pursuant to their rights by contacting privacyquestions@sfgmembers.com. Upon receiving a request, SFG will verify your request using the information associated with your products or services, including your email address. If there is a need to verify your identity prior to

releasing information in accordance with your request, we will contact you at the phone number or email address you provided in your request submission. Government identification may be required.

Retention. SFG will retain your personal data as long as reasonably required to conduct business with you or needed to service you, or as required by law. We will retain consumer data for the purpose of complying with legal and audit obligations, and for backup and archival purposes.

California Consumer Privacy Act. The CCPA provides an exemption for personal information collected pursuant to the Gramm-Leach-Bliley Act ("GLBA"). When receiving your personal information, we do so only for the purposes of determining our ability to:

- provide or maintain life insurance and financial products,
- authorize you to sell our products as an independent insurance agent, or,
- offer employment.

The CCPA enumerates certain rights to California residents. This section supplements the information contained in our Privacy Policy. We adopt this CCPA notice to comply with the CCPA, amendments, and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice. The CCPA contains several exemptions from coverage, including data collected for, processed, sold, or disclosed pursuant to the GLBA.

Right to Know. You have a right to submit a verifiable request, up to two times a year, for the following information:

- The categories of personal information we have collected from or about you*
- Specific pieces of your personal information*
- The categories of sources from which we have collected that personal information, and the business or commercial purpose for the collection*.
- The purposes for which the business uses the personal information*.

**For examples, please see the table in the "Data We Collect" section*

- The categories of third parties with whom we have shared your personal information, and the business or commercial purpose for sharing**

***For examples, please see the "How SFG Shares the Data with Third Parties" section*

Right to Delete. Consumers have the right to request that SFG delete personal information that has been collected. However, there are exemptions imposed on SFG along with other state and federal laws that may prevent SFG from deleting certain personal information. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction(s) for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, comply with our retention policy, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- We may also deny your request for deletion if the personal information collected was pursuant to the GLBA.

We will respond to all requests received under this section consistent with all applicable laws and regulations. If we are unable to fulfill a deletion request, we will tell you why in our response. SFG will not discriminate against you if you choose to exercise your privacy rights.

Data We Collect

Information we collect is utilized as noted in the table below, and is **not** sold to or shared with others for the purposes of marketing.

Cookies - Non-Personal Information

When you visit the SFG websites, we use “cookies” or similar technologies to collect non-personal information about our website visitors, including your browser type, mobile device operating system, browsing behavior, and from what general location (region) you access the website. This information may be aggregated to measure the number of visits, average time spent, page views, and other statistics about website(s) users. We may also use this information to track trends and solve technical problems, monitor website performance, and make the website(s) more robust and more convenient to use. You can control or reset your cookies and similar technologies through your web browser. You may also want to review and update ad settings and preferences on social media sites.

Personal Information

While you do not need to submit personal information to access certain aspects of the website, if you are a customer, agent or employee, when logging into our site or utilizing a service provided within our site, we collect personal information you provide to us directly, or indirectly via a financial professional (e.g. brokers, agents, advisors and distribution partners).

By submitting personal information through our website(s), you authorize SFG to store this information for the purposes described above, including responding to user inquiries, processing transactions at your (or your agent/advisor’s) direction, distributing materials, communicating with you electronically, and requesting feedback.

Personal information we may collect, how it is collected and why:

This table summarizes the data we are either presently collecting or have collected about consumers in the previous 12-months. This table is intended to comply with California’s notice at collection requirement.

Categories and examples of personal information collected	How We Collect	Purpose(s) of Collection
Unique Identifiers* – name, signature, alias, postal address, online identifier, internet protocol address, geolocation, email address, account name, social security number, passport number, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Evaluating application for appointment and/or employment and to maintain appointment or employment records Evaluating application for and/or to maintain insurance contracts Evaluating application and/or to maintain investment accounts Complying with legal or regulatory requirements

Categories and examples of personal information collected	How We Collect	Purpose(s) of Collection
Government ID and financial information – name and financial account number, driver's license, social security number, user name and password.	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Evaluating application for appointment and/or employment and to maintain appointment or employment records Evaluating application for and/or to maintain insurance contracts Evaluating application and/or to maintain investment accounts Verifying customer's identity Complying with legal or regulatory obligations
Commercial information – records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Evaluating application for appointment or employment through background checks and other means, and/or to maintain employment/appointment records. Evaluating application for and/or to maintain insurance contracts Evaluating application and/or to maintain investment accounts Verifying customer's identity Complying with legal or regulatory requirements
Biometric information such as fingerprints	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Evaluating application for appointment or employment through background checks and other means, and/or to maintain employment/appointment records. Evaluating application for and/or to maintain insurance contracts
Professional or employment related information	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Evaluating application for appointment or employment and/or to maintain appointment records or to issue and/or maintain insurance contracts
Education information	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Evaluating application for appointment or employment and/or to maintain appointment or employment records
Inferences drawn from the foregoing to create a profile about the agent, client, employee or applicant reflecting preferences or behavior	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Evaluating application for appointment or employment and/or to maintain appointment or employment records or to issue and/or maintain insurance contracts

Categories and examples of personal information collected	How We Collect	Purpose(s) of Collection
Protected classification information – race, gender, ethnicity, etc.	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Complying with legal or regulatory requirements during the application process and to maintain employment records
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding an interaction with an internet website, application, or advertisement	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Monitoring as it relates to employment: <ul style="list-style-type: none"> to maintaining employment records or ensure compliance with Company policies. Evaluating the performance and usability of our website(s). Assisting us in preventing physical harm or financial loss or in connection with the prevention or an investigation of suspected or actual illegal activity such as fraud
Audio, electronic, visual, or similar information, such as call or video recordings	<ul style="list-style-type: none"> Collected online or offline when you directly provide it to SFG through your use of our Services or from third parties 	<ul style="list-style-type: none"> Assisting in detection or prevention of Security Incidents and monitor for regulatory compliance. Recording and maintaining client instructions Performing quality assurance and training purposes

*Some personal information included in this category may overlap with other categories.

By submitting personal information through our website(s), you authorize SFG to securely store this information for the purposes described above, including responding to user inquiries, processing transactions at your (or your agent/advisor's) direction, distributing materials, communicating with you electronically, and requesting feedback.

Please note, our website does not respond to "Do Not Track" requests.

How SFG Shares the Data with Third Parties

SFG is committed to safeguarding the information we collect about you. **SFG does not sell any data, including your personal data to third parties.** We may share your personal information to a third party performing contractual services for us or on our behalf for a business purpose, or as required by law. When we disclose personal information for a business purpose, we require the recipient to keep your personal information confidential and not use it for any purpose except to provide contractual services to us. We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers with whom we have an active service agreement
- Third parties to whom you or your agent authorize us to disclose your personal information in connection with products or services we provide to you.

We may share your non-personal aggregated information with third parties we engage for site administration or reinsurance purposes. Through our website(s), you may be able to link to other

technology or services owned and provided by third parties. You may be required to submit personal information to access third-party websites. Such use of third-party features and submission of information using third-party websites will be subject to the third party's terms of use, terms of service and/or privacy policy. You agree to look solely to the applicable third party and not to SFG to enforce your rights in relation to use of the third-party service(s) provided.

SFG's Commitment to Data Security

At SFG, safeguarding our customers' confidential information is a primary concern. A wide variety of security technologies and processes have been implemented to safeguard our customer data. These processes are based on leading security standards, are reviewed on a regular basis, and are subject to audit. They include but are not limited to:

- Secure storage techniques including cryptographic controls
- Secure data transmission methods
- Access controls including role based access
- Anti-virus protection
- Malware protection
- Password standards
- Ongoing security awareness and training for all employees
- Physical and environmental controls for data centers
- Review of the security practices of our third-party vendors.

Children

SFG does not knowingly collect personal information from children without a legal guardian's consent. If we learn that we have collected personal information from a child without legal guardian consent, we will promptly delete that information and notify the legal guardian whenever possible. If you believe that a child may have provided us with personal information without legal guardian consent, please contact us.

Antidiscrimination

SFG will not discriminate against you for exercising your privacy rights. We will not:

- Deny you goods or services for exercising your privacy rights
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties for exercising your privacy rights
- Provide you a different level or quality of goods or services for exercising your privacy rights
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services for exercising your privacy rights.

Please note that a legitimate denial of a request for information or deletion is not discriminatory.

Contact Us

Your privacy is important to us and we are happy to answer any questions. For questions regarding this Privacy Policy, please contact us at privacyquestions@sfgmembers.com, or by calling 1-800-720-3955.