Theel Insurance and Financial Services Privacy Policy

Privacy Policy Types of Information Collected and How it is Used Aggregate Information: Design Benefits collects information that is not personal information about Users to measure traffic on the Site. This information is collected automatically on an aggregate basis ("Aggregate Information") through the use of a "cookie" or small text file placed on the User's hard drive by the User's Internet browser. The cookie allows IIABA to track the number of hits or visits to various pages on the Site. The cookie is used only during a single connection to the site, and is not used to track User activity after leaving the Site. The cookie is permanently disabled when the User exits the Site, and information about individual Users is not collected, saved or distributed to others by IIABA except as provided for in this Policy. Aggregate Information helps IIABA understand Users' needs, improve the Site, and demonstrate to others the volume and nature of Site traffic. Aggregate Information may be shared with third parties as described in the section called "Information Provided to Third Parties" below. Registration Information: Information may be obtained and/or retained from Users to: 1) process event and course registrations; 2) facilitate participation in Trusted Choice®; 3) facilitate participation in grassroots/legislative activities; and 4) facilitate the use of any fee-based services. Information about Users for event and course registrations may be provided by IIABA to exhibitors, sponsors, attendees and others, in any media, including, electronic or print form. Information for Trusted Choice® may be provided by IIABA to IIABA state associations and company participants and prospects for Trusted Choice®. Registration Information also may be provided to third parties, as described in the section called "Information Provided to Third Parties" below. Products, Services and Survey Information: Information may be obtained and/or retained to process orders for products and/or services offered by Design Benefit's. Design Benefit's also may obtain and/or retain information about Users who participate in surveys conducted by IIABA. Product, Service and Survey Information about Users also may be provided to third parties, as described in the section called "Information Provided to Third Parties" below. Grassroots/Legislative Activities Information: Personal and other information collected from Users for IIABA Grassroots/Legislative Activities may be used by Design Benefit's. Grassroots/Legislative Activities Information about Users also may be provided to third parties, as described in the section called "Information Provided to Third Parties" below. Career Center Information: Information collected for posting on the Site's Career Center may be made available to all who visit the Career Center and may be used by IIABA. Career Center Information about those who post information on the Site also may be provided to third p arties, as described in the section called "Information Provided to Third Parties" below. E-mail: Information received from Users via e-mail may be used by Design Benefit's and may be provided to third parties as described in the section called "Information Provided to Third Parties" below. Member Records/Agent Locator Information: IIABA makes member contact information available through the Site on an Agency Locator for use by the public. Information about members provided to IIABA online or in other forms may be used to update IIABA's Member Records and/or the Agent Locator. It is Theel Insurance's policy not to collect personal information of children under age 13. If it is necessary to collect such personal information from a child identified as being under age 13, Design Benefit's will do so only after obtaining verifiable parental consent. If Design Benefit's becomes aware that it has inadvertently collected personal information from a child under age 13 without pa rental consent, such personal information will be deleted from IIABA's system. Design Benefit's uses a combination of industry standard security measures to protect personal information it collects. Information Provided to Third

Parties Information collected on this Site will only be provided to third parties in the manner specified in this Policy. Those who do not want their information shared in this manner should not provide the information. Information obtained and/or retained by IIABA may be used by Design Benefit's, and may be provided to third parties, such as, but not limited to, Design Benefit's state associations and IIABA service providers and vendors, to conduct business, including, without limitation: i) completing the transaction(s) requested by the User; and ii) serving Users and/or reporting on transactions/activities/surveys conducted with IIABA. IIABA also may disclose information to comply with the law or legal process; to exercise IIABA's legal rights or defend against legal claims; to enforce IIABA's policies (including, without limitation, its Terms of Use); or to protect the rights, property or safety of others. Links to Other Sites This Site contains links to Internet sites of Design Benefit's members, state associations, and other businesses and resources, and each Internet site may have its own privacy and data collection policies and practices. Design Benefit's is not responsible for the privacy and data collection policies and practices of any of its members, state associations or other businesses and resources, or for the content of their Internet sites. Users interested in the privacy and data collection policies and practices of Design Benefit's members, state associations or other businesses and resources should review the policies of the Internet sites they choose to access. Design Benefit's makes no representations or warranties of any kind, express or implied, about the Internet sites of its members, state associations or other businesses and resources, and IIABA disclaims all warranties and responsibilities of any kind, including, without limitation, warranties and responsibilities with respect to IABA members', state associations', and other businesses' and resources' Internet sites, content, privacy and data collection policies and practices, and actions. Links to other Internet sites do not imply IIABA's endorsement or approval of such Internet sites or the resources and information contained within them, nor are such links or references indications that IIABA has received specific authorization to provide these links or resources. IIABA does not endorse, approve, certify or control such external Internet sites, and is not responsible for the accuracy, timeliness, completeness, efficacy, merchantability, usefulness, fitness for any particular purpose or correct sequencing of information located at such sites. The links and references on this Site to other Internet sites are provided solely as a convenience to Users of this Site. Your Right to Access and Amend Your Personal Information You have the right to request access to the personal information that is maintained about you on this Site to ensure that it is accurate and current. You also can request corrections, amendments or deletions of any personal information obtained through this Site or otherwise in our possession. To obtain access to, correct, amend, or delete any of your personal information: Submit a request in writing to Theel Insurance's Privacy, Office of the General Counsel, 127 South Peyton Street, Alexandria, Virginia 22314-2803. The request should include your name; address; telephone number; agency information (name, address and IIABA member number); the specific personal information in dispute; and the identity of the document or record that contains the disputed personal information. Upon receipt of your request, we will contact you within 30 business days to notify you either that we have made the correction, amendment or deletion, or that we will not do so and the reasons for the decision not to do so. Change to Policy Design Benefit's reserves the right to and may change this Policy at any time, and the change will become effective when the revised Policy is posted on this Site. You are encouraged to review this Policy periodically so you are informed about Design Benefit's privacy practices and policies. * * * * *

We keep electronic signatures on file.