



PRIVACY NOTICE

This notice is provided on behalf of Western Growers Financial Services and Western Growers Insurance Services

PROTECTING YOUR PRIVACY

This Notice is required by law. It describes how we handle 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 INFORMATION WE COLLECT ABOUT YOU

We follow strict standards to protect personal information. These standards include limiting access to data and regularly testing our security technology.

HOW WE COLLECT 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 includes data we receive when you visit our website.

MEDICAL INFORMATION

We do not share 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
- when you consent

ACCURACY OF INFORMATION

We strive for accurate records. Please tell us if you receive any incorrect materials from us. We will make the appropriate changes.

HOW WE SHARE INFORMATION

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

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

- to assist us in providing service
- to help design and improve products
- 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 personal information about you or about former customers, plan participants or beneficiaries. 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
- for other legal purposes

We also may share personal information:

- with others that service your accounts or that 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
- with other companies with your consent, at your request or as allowed by law

MORE INFORMATION

You can write to us if you have questions about our privacy notice. Contact our Privacy Officer at PO Box 2126, Irvine, CA 92658 or call 1-888-737-8483.

Information regarding the Securities Investors Protection Corporation (SIPC), including a SIPC brochure, may be obtained by contacting SIPC via its website at www.sipc.org or by phone (202) 371-8300.

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.

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 and post this policy on our website www.wgfs.net.

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.