

St. Johns Insurance Company, Inc.

Privacy Policy Notice

(as of 08/13/09)

This Privacy Policy identifies the personal information we collect and hold. It describes how we use, share and protect it. It also explains how to contact us if you have any questions regarding this Privacy Policy or the personal information collected about you. The Privacy Policy applies to personal information collected from or about former customers and current customers.

1. Information we collect

Based on our relationship with you, we collect certain personal information from and about you. The information collected is adequate, relevant and appropriate for the particular insurance product or services for which you have applied or obtained from us. For example, we may collect or verify personal information from or about you from the sources and of the type indicated below.

- **From applications, forms, your communications (including electronic communications) and other interactions** - information including, without limitation, your name, address, email address, telephone number, Social Security or other identification number, and property to be insured.
- **From your transactions with us or others, as permitted by law** - information including, without limitation, payment history, past premiums, claims history, credit history where relevant, and loss information reports.

2. How we use your information

We use personal information to provide, maintain, service and process the products and services we provide to you or which you request from us. This may include, but are not limited to, using it to (a) evaluate your insurance requests; (b) process, service and maintain policies and transactions; (c) administer and investigate claims; (d) resolve disputes; (e) prevent fraud; (f) monitor and archive communications; or (g) perform risk control, including obtaining reinsurance.

Additionally, we may use your personal information (a) in accordance with applicable law; (b) to verify your identity when you inquire regarding a product furnished by us to you; or (c) to comply with legal and regulatory requirements.

3. Information we may share with or disclose to affiliated and nonaffiliated third parties

We do not rent or sell personal information. We share or disclose personal information to affiliates and nonaffiliates to effect, administer or enforce a transaction that you requested or authorized. We also share or disclose information to affiliated and nonaffiliated third parties (a) in connection with servicing or processing an insurance product or service that you requested or authorized or maintaining or servicing your account or (b) to comply with our obligations or assert our rights as an insurer. For example, we may share or disclose personal information to these affiliated or nonaffiliated third parties to assist us in the following:

- Processing, billing or collecting premiums or amounts due to us
- Underwriting coverage
- Determining benefits
- Administering, processing, investigating or servicing claims
- Determining the coverage risk

- Investigating and preventing fraud or material misrepresentation
- Providing services required of an insurer.

In addition, these affiliated and nonaffiliated third parties help us by (a) mailing policy statements and other information for us; (b) verifying information or coverage, including identity; (c) developing, operating and maintaining our services and systems; and (d) assessing risk.

These affiliated and nonaffiliated third parties are required to (a) protect the confidentiality and security of personal information and (b) use the personal information only for the purposes for which we retain them and in accordance with this Privacy Policy.

4. Information we may share or disclose as required by law

We may also share or disclose personal information to (a) government agencies and regulatory and law enforcement authorities in accordance with federal, state and local law or (b) as otherwise required by law.

5. How we protect the confidentiality and security of personal information

We have implemented a program which includes administrative, technological and physical procedures to protect personal information. We utilize, in addition to other measures, the following:

- **People.** We educate our employees to treat personal information with care. We work to limit its access to those who need it for the purposes stated in this Privacy Notice.
- **Policies and Procedures.** We maintain, monitor, and update our physical, electronic and procedural safeguards. We comply with applicable regulations to protect personal information.
- **Security.** We take reasonable technical and organizational security measure, under the circumstances, to keep personal information confidential. We secure personal information against unauthorized or unlawful access, and to prevent loss, destruction, or damage.
- **Commitment.** We require any person or organization providing products or services on our behalf to protect personal information that is provided to them or to which they have access from or through us.

6. Changes to Privacy Policy

We reserve the right to change this Privacy Policy, at any time. We will send you a revised Privacy Policy if we materially change it. For example, should we intend to (a) provide personal information, for a purpose or use not referenced in this Privacy Policy or (b) disclose or share personal information to others for a purpose or use not referenced in this Privacy Policy, we will notify you of the change.

8. Your rights

You have the right to obtain from us the personal information we have collected regarding you and to correct such information.

9. Contact Us

If you have any questions regarding this Privacy Policy Notice, you may contact us via e-mail at info@stjohnsinsurance.com or by telephone at 866.304.7779.