

Protecting your privacy

First Palladium, LLC and its affiliates (“First Palladium”) (please see our website for a list of affiliated companies: legal.ashbrokerage.com) support insurance agents in their sale and marketing of fixed and variable insurance products; and, in some cases First Palladium may be part of transactions directly with end consumers. As part of the process of providing products and/or services, we are committed to protecting your privacy concerning the personal information (“PI”) we collect about you. We do not sell your PI to third parties, but we may share it with third parties as necessary to provide you with the products or services you or your agent request and to administer your business with/through us. This Notice describes our current privacy practices. For as long as we have your PI, we will protect it.

Information we may collect and use

We collect PI about you as part of the services we provide to you and/or your agent. The type of PI we collect depends on the products or services and may include the following:

- Information from you: When you respond to online marketing or submit applications or other forms, you give us information that may include your name, address, Social Security number, date of birth and history concerning financial, health, and employment matters.
- Information about your transactions: We keep information about your transactions, such as the products you buy and the amount you paid for those products.
- Information from other sources: We may collect information from consumer reporting agencies such as your credit history, credit scores, and driving and employment records. With your authorization, we may also collect information, such as medical information from other individuals or businesses.

How we use your personal information

We may share your PI within our company, and with affiliates, insurance companies, insurance support organizations, certain parties to effectuate your transactions, marketers and those you have authorized us to share. We or they use this information for identification purposes, to process your requests and transactions, to offer or provide insurance/investment services on our behalf, to provide customer service, or to analyze in order to enhance our products and services. Information we obtain from reports prepared by service providers may be kept by the service providers and shared with other persons; however, we require our service providers to protect your PI and to use or disclose it only for the work they perform for us, or as permitted by law. When you apply for a product, we may share information about your application with credit bureaus. We also may provide information to regulatory authorities, law enforcement officials and to others when we believe in good faith that the law requires disclosure.

Security of information

We have an important responsibility to keep your information safe. We use physical, electronic and procedural safeguards to protect your information from unauthorized disclosure. Our employees are trained and authorized to access your information only when they need it to provide you with products, services, or to maintain your accounts. Employees who have access to your PI are required to keep it confidential. Employees are trained on the importance of data privacy. When we share PI with third parties for the purposes noted above, we ensure there are contractual restrictions on their use and disclosure of that information.

Your rights regarding your personal information

- Accuracy of Information: We strive for accurate records. Please tell us if you receive any incorrect materials from us or if you feel the PI we have about you is inaccurate, incomplete, or not current by writing to us at the below address. We will correct any inaccurate or outdated information as soon as possible.
- Access: We will tell you what PI we have about you that by law we are required to provide you (“Disclosable PI”). Upon written or phone request, you may see a copy of the Disclosable PI in person or receive a copy by mail or email, whichever you prefer. Please give us 45 business days to prepare. We will not provide you with information we have collected in connection with, or in anticipation of, a claim or legal proceeding. For certain state requirements, please see our website: legal.ashbrokerage.com.

Contacting us

If you have questions about this privacy notice, please contact us at:

First Palladium, LLC
Attn: Chief Compliance Officer
888 South Harrison Street, Suite 900
Fort Wayne, IN 46802
(800) 589-3000

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

**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.*

**Your agent, consultant or advisor may have a different privacy policy.*