

# Our privacy commitment to you

OneAmerica Financial Partners, Inc. and our affiliated companies recognize that the cornerstone of our success is the trust and confidence of our customers. To provide you with the most effective and convenient access to our broad range of products and services, OneAmerica® and our affiliates must maintain information about you. **Because keeping your information secure and private has always been one of our top priorities, you are not required to take any action with us to further protect your privacy.**

This notice lets you know how we collect information about you, the type of information we collect and what we may disclose to our affiliates and nonaffiliated third parties. It also details the steps we take to protect nonpublic personal information.

## Collection of information

We must collect a certain amount of information to provide customer service, offer new products or services, evaluate benefits and claims, administer our products, and fulfill legal and regulatory requirements. Specific language and examples may not apply to all customers, and the data we collect varies accordingly.

### **Examples include information:**

- on your application and related forms, such as name, address, date of birth, Social Security number, gender, marital status, driving history, assets, income and investment option elections;
- about your relationship with us, such as products or services purchased, account balances, payment history and claims history;
- provided by your employer, benefits plan sponsor or association regarding any group product you may have, such as name, address, Social Security number, age, income and marital status;
- from a consumer reporting agency, such as consumer's credit worthiness and credit history;
- from other sources, such as motor vehicle reports, medical information and demographic information; and

- from visitors to our Web sites, such as that provided through online forms, site visit data and online information-collecting devices known as "cookies." Cookies enable the site to "remember" who you are so you can navigate the site more easily. They also permit you to access secured information and conduct secured transactions. We do not record personal or sensitive information in our cookies.

## Sharing and use of information

While protecting customer information is important, we may find it necessary in the course of conducting business to disclose information we collect about you. This would occur in some or all of the following circumstances.

### **We may share information as permitted or required by law with:**

- our affiliates to enable them to provide customer service or account maintenance, or so they may tell you about other products or services offered that might be useful to you;
- nonaffiliated third parties who are assisting us by performing services or functions on our behalf, such as agents, brokers, brokerage firms, insurance companies, administrators and service providers;
- other financial service companies, such as banks, insurance companies and securities brokers or dealers, with whom we have written joint marketing agreements; and
- nonaffiliated third parties for compliance with a subpoena, fraud prevention or an inquiry from a government agency or regulator.

Personal health information will be shared only with proper written authorization or as required by law. We will not share medical information or motor vehicle reports for marketing purposes.

Information obtained from a report prepared by an insurance-support organization may be retained by that organization and disclosed to others.

### Protecting the information

We are committed to maintaining the security of our customers' personal information. To ensure such information is used only in the manner we have described in this policy, we have instituted the following safeguards:

- Employees are required to comply with our established privacy policies and procedures, which exist to protect the confidentiality of customer information. Any employee who violates our privacy policies will be subject to a disciplinary process.
- Employees access the information only on a business need-to-know basis, such as to pay benefits or claims, underwrite a policy, administer a plan or service a customer request.
- We use manual and electronic security procedures to maintain the confidentiality of the information we collect and to guard against its unauthorized access. Such methods include locked files, user authentication, encryption and firewall technology.

### Confidentiality of abuse information:

You have the right to be considered a protected person. A "protected person" is a victim of domestic abuse who has notified us that he or she is or has been the victim of domestic abuse and who is either: (1) a present or proposed principal insured or certificate holder; (2) a present or proposed policy owner; (3) a present applicant; (4) a present claimant; (5) one who derives or is proposed to derive insurance coverage under an insurance policy subject to the New Mexico domestic abuse regulations; or (6) an individual or entity that provides shelter, advocacy, counseling or protection to victims of domestic abuse.

Please send your written request for "protected person" status and the confidentiality of abuse information to the address on this page.

### Consumer reporting information

If required by law and upon written request, we will inform you as to whether a consumer report was requested, as well as the name and address of the consumer reporting agency that furnished the report.

If permitted by law, we may share credit reporting information about you with our affiliates. Under the Fair Credit Reporting Act, you may direct us not to share certain credit information with our affiliates, including some nonpublic personal information you provide in your application or that we obtain from nonaffiliated third parties, such as credit bureaus. If you do not want such credit information shared, you may write to us at the address listed on this page. Please provide your name, address, Social Security number and account number(s). Your request not to share credit information does not include information we are permitted by law to share with our affiliates, such as information related solely to our experiences or transactions with you, including account balance and payment history.

### Review of and access to your information

If required by law and upon written request, we will make information from your file available for your review. We are unable to provide information collected in connection with, or in anticipation of, any claim or lawsuit or any medical information we have obtained from a health care provider.

If you notify OneAmerica that any information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which will be included in any future disclosure of information.

If you have any questions about the right of access or wish to access your file (as permitted by law), please contact us at the address below and include a copy of your personal identification, such as a driver's license or photo identification.

Privacy Officer  
OneAmerica Financial Partners, Inc.  
One American Square, P.O. Box 368  
Indianapolis, IN 46206-0368

### Our continuing commitment

We will continue to provide this notice at the frequency required by law and will notify customers of any changes at least annually.

We will continue to follow the policies set forth in this notice even when a customer relationship no longer exists. However, that party will no longer be entitled to an annual notice.

This notice is being provided on behalf of the following OneAmerica affiliates:

American United Life Insurance Company®  
American United Mutual Insurance Holding Company  
OneAmerica Financial Partners, Inc.  
The State Life Insurance Company  
AUL Reinsurance Management Services, LLC  
AUL Reinsurance Management Services Canada Ltd.  
OneAmerica Securities, Inc.  
Pioneer Mutual Life Insurance Company<sup>1</sup>  
R.E. Moulton, Inc.

Our privacy commitment to you also extends to those companies with which we affiliate during the next 12 months.

<sup>1</sup>. A stock subsidiary of American United Mutual Insurance Holding Company