Massmark Privacy Policy Version 1.0

<u>Introduction</u>. Massmark, Inc. ("Massmark" or "we") has created this Privacy Policy to demonstrate our firm commitment to privacy and to disclose our practices in gathering, using and disclosing personal information in connection with our web site (wright.massmarkinc.com) ("Site"). Personal information is information about a person that includes identifying information about that person. Although there are may be links from this Site to other web sites, this Privacy Policy applies only to this Site and not to sites operated by others. For example, if you click on a link to the web site of one of our partners or sponsors, the click takes you out of our Site. We are not responsible for the content or privacy practices of other web sites.

- **1. Openness.** We follow a general policy of openness regarding our privacy practices. This Privacy Policy sets out the fair information practices that govern the collection, maintenance, use and disclosure of personal information regarding visitors who use this Site.
- **2. Revisions to the Privacy Policy.** We may revise this Privacy Policy from time to time as we add new features or as laws change that may affect our services. If we make material changes to this Privacy Policy, we will post a new version number at the beginning of this Privacy Policy, consisting of the date (year and month) the Policy was last revised, so that you will be able to tell when the Privacy Policy was last changed.
- **3.** Collection of Personal Information. Except as disclosed in this Policy (see below) or as disclosed on other pages on this Site where information may be collected, we do not collect personal information about visitors to this Site.
- a. Web logs. We maintain standard web logs that record data about all visitors who use this Site. These logs may contain:
 - i. The Internet domain from which you access this Site (e.g., aol.com, abc.org);
 - ii. Your Internet Protocol (IP) address. Your computer is automatically assigned a number which acts as its IP address when you surf the Internet. Your IP address is either static (always stays the same) or dynamic (changes from time to time). A static IP address may be identifiable to you, while a dynamic address is usually not identifiable.
 - iii. The type of browser and operating system you use.
 - iv. The date and time you visited the Site.
 - v. The pages that you saw on this Site.
 - vi. The address of the web site you linked here from.

We use web log information to help us design our Site, to identify popular features, and to make the Site more useful for visitors. Web logs are recorded in sequential files, and we do

not normally try to identify individuals from web logs or use web logs to gather information about individuals. However, we may use web logs to identify any person attempting to break into or damage our Site, and we may share web log information with law enforcement agencies if we believe that we have evidence of a violation of computer security or related laws.

- b. <u>Internet Cookies</u>. We may place Internet cookies on a visitor's computer hard drive. Internet cookies save data about individuals, such as their name, user-name and the pages they visit on our Site. When a visitor with one of our cookies on his or her computer revisits our Site, we are able to recognize that computer and tailor our Site to be more helpful and efficient for that visitor. Also, cookies help us to provide streamlined services, and to document our transactions with visitors to this Site. You may have software on your computer that will allow you to decline or deactivate Internet cookies, but if you do so, some features of this Site may not work properly for you.
- c. <u>Information Needed to Receive and Process Applications for Insurance</u>. Personal information about you and others is needed by us to provide quotes and to receive and process applications for insurance on this Site.
- **4. Access, Correction, Deletion and Data Integrity.** Requests to access, correct or delete personal information may be submitted using our contact information. Please note that we do not consider web log information to be personal information. Also, we may not be able to delete or revise information about you that we have relied upon to provide services to you, or that we are legally required to maintain.
- **5.** Use and Disclosure of Personal Information. We do not sell or rent personal information about visitors to this Site. We do not use or disclose personal information obtained through this Site except as expressly described in this Policy (see below).
- a. <u>Uses</u>. We use information obtained from web logs, cookies and visitor requests for the purposes described in this Policy. We also use personal information obtained from this Site to respond to requests, improve our services, demonstrate the quality of our services to our auditors and government agencies that have authority over us, and for the additional purposes described below.
- b. <u>Disclosures</u>. We may disclose personal information to any person or business that is performing audit, legal, operational or other services for us, including third-party parties whom Massmark engages to administer insurance policies and benefits. Whenever possible, we will require any recipient of personal information for these purposes to agree in writing to use the information only for the purpose for which it was disclosed and to destroy or return it when no longer needed for that purpose. We may disclose personal information when required to do so by a subpoena, court order, or search warrant. Except when deemed by us to be infeasible, we will notify the individual of a subpoena, court order or search warrant for the individual information, by e-mail using the e-mail address (if any) that the individual provided to us.

We may disclose personal information as we deem appropriate to protect the safety of an individual or for an investigation related to public safety or to report an activity that appears to be in violation of law.

We may disclose personal information to protect the security and reliability of this Site, and to take precautions against liability.

We may disclose personal information to any successor in interest (any company or organization that purchases or otherwise takes over our assets).

This Site is operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States. By using our Site, participating in any of our services and/or providing us with your information, you consent to this transfer.

6. Security. We protect the personal information we have collected from this Site by using industry standard security precautions against loss and unauthorized access, destruction, use, modification or disclosure of that information. When credit card or other financial information is transmitted over the Internet we use industry standard, SSL (secure socket layer) encryption to protect that information. We have security measures in place to protect the loss, misuse and alteration of the personal information under our control. These hardened security systems include firewalls, authenticated access to internal databases, and audit of regular procedures. The Massmark Data Center is housed in a highly secure, environmentally controlled location, with redundant connectivity to network services and a failsafe electrical supply. Access to the Massmark Data Center is restricted by use of keypad lock where the number combination is changed on a scheduled basis.

The security of Personal Information is protected during transmission by using 128-bit Secure Sockets Layer (SSL) software, which encrypts all information gathered on the Site. We utilize a registered secure certificate authority to provide secure e-commerce transactions, identity verification and authentication to the global web community.

- **7. Children.** We do not intend to collect personal information from anyone under the age of 18 and in any event will not do so without the permission of the child's parent or guardian. Visitors who wish to participate on our Site and provide personal information indicating that they are under 18 years of age are required to provide the e-mail address of their parent or guardian. Before we will decide to allow further use, we will send an e-mail message to that parent or guardian alerting them to the child's request to participate on our Site, and we ask for the permission of the parent or guardian. If permission is not promptly received, we delete all information about that visitor from our system as quickly as possible. No information collected from users under the age of 18 is used for any marketing or promotional purposes whatsoever.
- **8. Questions, Complaints or Requests to Change Information**. If at any time you wish to contact us with a question or complaint or to exercise any of the rights set out in this Privacy Policy, or if you want to change any information collected by us, you may do so by contacting us by e-mail, telephone, fax, or U.S. Mail, using the information set out below.

Massmark, Inc. 85 White Bridge Road, Suite 301 Nashville, Tennessee 37205

Phone: (615) 356-5451 Fax: (615) 356-5453



Privacy Policy



This is our privacy policy which describes how we treat Information we receive ("Information") about our customers.

Why we collect and how we use Information:

We collect and use Information for business purposes with respect to insurance products and other business relationships involving our customers. We may also use Information to offer our customers other products or services we provide.

How we collect Information:

We get most Information directly from our customers. Customers may be an individual consumer or the organization to which an individual consumer belongs. The Information that a customer gives us when applying for insurance products or purchasing other services is generally the Information we need. If we need to verify the Information or need additional Information we may obtain Information from third parties such as adult family members, employers, or financial institutions to which a customer belongs. Information collected may relate to finances, employment, health, avocations or other personal characteristics as well as other transactions with us or with others including our affiliates.

How we protect Information:

We treat Information in a confidential manner. Our employees are required to protect confidentiality of Information. Employees may access Information only when there is an appropriate reason to do so such as to administer products or provide services. We also maintain physical, electronic, and procedural safeguards to protect Information; these safeguards comply with all applicable laws. Employees are required to comply with these policies.

Information disclosure:

We may disclose any Information when we believe it necessary for the conduct of our business or where disclosure is required by law. We will protect Information and comply as may be necessary with all requirements of the Gramm-Leach-Bliley Act and relevant state and federal regulations pursuant thereto and all state privacy laws. In compliance with these laws, Information may be disclosed to others including independent agents and brokers to enable them to provide business services such as offering our products to our customers. Information may also be disclosed for audit or research purposes; or to law enforcement and regulatory agencies, for example, to help us to prevent fraud. We may also make other disclosures of Information as permitted by law.

Access to and correction of Information:

Generally, upon written request, we will make available Information for review. Information collected in connection with or in anticipation of any claim or legal proceeding will not be made available. If a customer notifies us that Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, a customer may submit a short statement of dispute which we will include in any future disclosure of Information.