

## Ameritas Privacy of Customer Nonpublic Personal Information Policy

This Policy applies to each of the following Ameritas Holding Company Subsidiaries (“the Companies”):

- Ameritas Life Insurance Corp.
- Ameritas Life Insurance Corp. of New York
- Ameritas Investment Company, LLC
- Ameritas Investment Partners, Inc.
- Ameritas Advisory Services, LLC
- Variable Contract Agency, LLC

### I. Definitions

**Consumer:** A “consumer” is an individual who obtains or has obtained a financial product or service from a financial institution that is to be used primarily for personal, family, or household purposes, or that individual’s legal representative.

**Customer:** A “customer” is a consumer who has a “customer relationship” with a financial institution. A “customer relationship” is a continuing relationship with a consumer.

**Financial Institution:** Any institution the business of which is engaging in financial activities as described in section 4(k) of the *Bank Holding Company Act* (12 U.S.C. § 1843(k)). Direct subsidiaries of Ameritas Holding Company are considered to be financial institutions under the law and for purposes of this policy.

**Nonpublic Personal Information (“NPI”):** Any information about a customer or consumer that is not publicly available and is (1) provided by a consumer to a financial institution in order to obtain a product or service; (2) resulting from any transaction involving a financial product or service between a financial institution and a consumer; and (3) otherwise obtained by a financial institution in connection with providing a financial product or service.

### II. Privacy Officer

A Privacy Officer (“PO”) appointed by the Chief Executive Officer of each of the above listed companies, shall maintain responsibility for managing and coordinating privacy compliance matters.

### III. Nonpublic Personal Information Collected

Each of the Companies collect information about its customers for the purpose of conducting routine business functions such as underwriting policies; providing customer service; and paying claims. Some of the customer information collected is NPI. Following are examples of NPI that may be collected during the course of business:

#### A. Personal identification and contact information:

- Name, address and telephone number (in certain circumstances may be nonpublic);
- Date of birth;
- Employment status; and
- Social Security number.

#### B. Financial information

- Assets;
- Policy beneficiary information;
- Income; and in some cases;
- Credit history.

#### C. Health information which is only collected as necessary to underwrite products and process claims.

#### IV. How NPI is Gathered

Most of the NPI collected comes directly from the consumer/customer during the application process. NPI may also be obtained from:

- A. **Agents and brokers who help initiate and service customer accounts;**
- B. **Governmental agencies; and**
- C. **Independent reporting agencies.**
- D. **Covered Entities**

#### V. Using and Sharing NPI

##### A. Within the Companies

NPI may be used and shared within the Companies for business purposes including to: service customers; design new products; make improvements to the products we offer; and offer customers other products and services that may be of benefit to them. The Companies will only share NPI among its affiliates as permitted by law. Non-experience customer information (as defined by the Fair Credit Reporting Act) is not shared within the Companies or with third parties.

##### B. Outside the Companies

NPI may not be sold or shared outside of the Companies for marketing purposes without first providing an opt-out opportunity to customers, or, in some States, first obtaining an opt-in (authorization) from customers. NPI may be shared outside of the Companies without an opt-out or opt-in as follows:

- **Service Providers.** Service providers are unrelated companies who perform business transactions on behalf of one or more of the Companies. Disclosures to service providers are a part of business operations. Customer information may be shared with service providers only when service providers enter into a written contract requiring them to keep customer information confidential and prohibiting them from using customer information for their own purposes or re-disclosing it to anyone.
- **Required by Law.** Sometimes the law *requires* that customer NPI be shared such as in response to a valid summons, court order, search warrant or subpoena.
- **Agents and Brokers.** NPI may be shared with agents or brokers so that they may provide customers with efficient and superior service. Our agents and brokers are legally required to maintain customer privacy and safeguard customer information.
- **Health or Medical Information.** Customer medical or health information will not be released to anyone unless the disclosure is permitted or required by law. Any other disclosure of customer health or medical information that is not specifically permitted or required by law will not be made without written authorization from the customer or their legal representative.

#### VI. Notice of Privacy Practices to Customers

A Notice of Privacy Practices will be provided to each customer upon the initiation of the customer relationship and as required by a state law once annually for the duration of the business relationship. If the Privacy Policy is revised in such a manner that allows more liberal treatment of customer or consumer information and as such impacts the accuracy of the current notice, a revised notice will be sent to each customer, or consumer if applicable, as soon as feasible but in no case longer than within 30 days of the implementation of the new policies. The Privacy Office will be responsible for documenting compliance with the privacy notice requirements, including confirmation that there are adequate processes and procedures for providing the privacy notice as required by law and that those procedures have been followed.

## **VII. Customer Access and Request for Corrections**

Customers have the right to review the information that we maintain about them. A request must be made in writing and include the customer's full name, address and policy or account number. Once an access request is received from a customer in writing, we must provide access or copies within 30 days of the request. We may charge a reasonable fee for any copies provided.

Customers have the right to request that we make corrections to the information that we maintain about them if the customer believes that our records are incorrect. A request for correction must be in writing and must indicate the incorrect information, the reason for the request and the correct information to replace any incorrect information. Once a request for correction is received from a customer in writing, we must make an investigation into the accuracy of the information we maintain and the corrected information on the request. If the determination is made that the information is correct without making a revision to our records, we must notify the customer that we will not make the requested revision within 30 days of the original request. If the determination is made that the correction is appropriate, we will correct our records and notify the customer within 30 days of the original request that the requested correction has been made.

## **VIII. Safeguarding NPI**

We will maintain physical and electronic safeguards designed to protect NPI. Access of NPI shall be restricted to our employees and agents who need it to perform their jobs. Employees receive periodic training in the proper handling of NPI.

## **IX. Former Customers' NPI**

These policies apply equally to current and former customers for as long as NPI is maintained on a customer. NPI will be maintained for the period of time required by law and then destroyed according to Corporate Records Destruction Policies. Former customers do not receive an annual Privacy Notice.

This information is provided by Ameritas®, which is a marketing name for subsidiaries of Ameritas Mutual Holding Company. Subsidiaries include Ameritas Life Insurance Corp. in Lincoln, Nebraska and Ameritas Life Insurance Corp. of New York (licensed in New York) in White Plains, New York. Each company is solely responsible for its own financial condition and contractual obligations. For more information about Ameritas®, visit [ameritas.com](http://ameritas.com).

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