

# Privacy Policy

## December 2019

---

### Privacy Statement

At Midland National Life Insurance Company and North American Company for Life and Health Insurance (collectively “SFG Member Companies”), we value the privacy of our customers, agents, and website visitors. This Privacy Policy describes the ways we gather, use, disclose, and manage information we may collect or utilize from website visitors.

We want you to understand your privacy rights while on our websites. If you do not agree with the terms outlined below, do not access the SFG Member Companies websites.

This Privacy Policy does not apply to any third party websites that display or reference a different Privacy Statement/Policy.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Policy. Please review this Policy from time to time so you understand our privacy practices.

### Information We Collect

When you visit our website(s), we may collect limited information about you.

- We may use “cookies” or similar technologies to collect non-personal information about website visitors, including your browser type, mobile device operating system, browsing behavior, and when and from what location you access the website(s). This information may be aggregated to measure the number of visits, average time spent, page views, and other statistics about website(s) users. We may also use this information to track trends and statistics and solve technical problems or monitor website performance and to make the website(s) more robust and more convenient to use.

We collect personal information you provide to us. Personal information means information that can be used to identify and contact you, such as your name, address, or date of birth. You do not need to submit personal information to access certain aspects of the website. The types of information we collect directly from you may include:

- Job Applications – we ask you to provide information, such as your name and email address, when you choose to register to apply for a job with SFG Member Companies.
- Identifiers and Account Specific Information – the information you provide on applications or other forms, such as your name, address, telephone number, and social security number. When you choose to access your account(s) through our website, we require you to provide certain information, including your name, email address, and account information. We may collect certain other information in connection with your insurance policy/contract for the purpose of servicing your policy. By using our website(s) to access policy specific information, you grant SFG Member Companies permission to gather the personal information necessary to provide this service to you. Such information is processed and stored securely within our systems using commercially reasonable security measures.

Specific categories of personal information we may collect include:

Specific Categories of personal information collected	Purpose for which categories of personal information shall be used
Identifiers – such as real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, geolocation, email address, account name, social security number, driver’s license number, passport number, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Evaluating application for appointment, employment and to maintain appointment records. Evaluating application for and/or to maintain insurance contracts
Information protected against security breaches – name and financial account number, driver’s license, social security number, user name and password.	Evaluating application for appointment, employment and to maintain appointment records. Evaluating application for and/or to maintain insurance contracts
Commercial information – records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Evaluating application for appointment or employment through background checks and other means, for employment/appointment and to maintain employment/appointment records. Evaluating application for and/or to maintain insurance contracts
Biometric information	Evaluating application for appointment or employment through background checks and other means, for employment/appointment and to maintain employment/appointment records. Evaluating application for and/or to maintain insurance contracts
Professional or employment related information	Evaluating application for appointment and to maintain appointment records. Evaluating application for and/or to maintain insurance contracts
Education information	Evaluating application for appointment and to maintain appointment records.
Inferences drawn from the foregoing to create a profile about the agent, client, employee or applicant reflecting preferences or behavior.	Evaluating application for appointment and to maintain appointment records or to maintain and service insurance contracts.
Protected classification information – race, gender, ethnicity, etc.	As required by law during the application process and to maintain employment records.
Internet or other electronic network activity information – browsing history, search history, and information regarding an interaction with an internet web site, application, or advertisement.	To maintain employment records or ensure compliance with Company policies. To evaluate the performance and usability of our website(s). To assist us in preventing physical harm or financial loss or in connection with the prevention or an investigation of suspected or actual illegal activity such as fraud.

By submitting personal information through our website(s), you authorize SFG Member Companies to store this information for the purposes described above, including responding to user inquiries, processing transactions at your direction, distributing materials, communicating with you electronically, and requesting feedback.

Please note, our website does not respond to “Do Not Track” requests.

## How We Use Personal Information Collected

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information was provided. For example, if you provide us with personal information in order for us to issue an insurance contract, we will use the data provided to evaluate your policy application or service an active policy, and provide the services described within your policy.
- To provide you with information, products or services that you request from us.
- To provide you with email notifications or other notices related to your contract/policy.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- Assist us in preventing physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity such as fraud

## Parties with Whom We Share Information

Unless otherwise required by law, we do not share your information with third parties solely because you visited our website. We may share website visitor information with third parties if we deem it reasonably necessary to:

- Adhere to any law or pursuant to legal process or in response to a reasonable request from law enforcement authorities or other government officials
- Enforce and investigate violations of our Terms of Use
- Assist us in preventing physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity such as fraud
- Protect our legal rights

We may share your information with third parties we engage for site administration purposes.

Through our website(s), you may be able to link to other technology or services owned and provided by third parties. You may be required to submit personal information to access third-party websites. Such use of third-party features and submission of information using third-party websites will be subject to the third party’s terms of use, terms of service and privacy policy. You agree to look solely to the applicable third party and not to SFG Member Companies to enforce your rights in relation to use of the third-party service(s) provided. When linking to any third-party site or features, our Privacy Policy and Terms of Use no longer applies and you must read the terms of use, terms of service, and privacy policy of the third-party to see how your personal information will be handled on their website(s).

We may share your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we require the recipient to keep your personal information confidential and not use it for any purpose except to provide services to us. We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers with whom we have an active service agreement
- Third parties to whom you or your agent authorize us to disclose your personal information in connection with products or services we provide to you. In the preceding twelve (12) months, we have not sold any personal information.

## Privacy of Children

We do not knowingly collect and retain personal information from children within our website(s). If you believe that your child has provided their personal information to SFG Member Companies website(s) without your permission, please contact us so that we can investigate, identify, and delete that information.

## Data Retention

We retain information you provide for as long as needed to conduct business with you or needed to service you, our customer, or as required by law.

## Data Security

We use commercially reasonable security measures to protect records containing personal information and appropriately limit the internal access to that data.

## Non-Discrimination

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by law, we will not:

- Deny you goods or services for exercising your privacy rights.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties for exercising your privacy rights.
- Provide you a different level or quality of goods or services for exercising your privacy rights.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services for exercising your privacy rights.

## Deletion Request Rights

In certain states, you may have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction(s) for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

For questions regarding our Privacy Policy, please contact us at [privacyquestions@sfgmembers.com](mailto:privacyquestions@sfgmembers.com), or by calling 1-800-720-3955.