



VFW INSURANCE PROGRAM WEBSITE PRIVACY POLICY

Effective Date: This Website Privacy Policy was updated on 12/20/2013, and is effective as of that date.

1. Policy Overview

1.1. Lockton Affinity ("Affinity"/"we"/"our"/"our company") offers an array of insurance products for affinity organizations and their members. Affinity is committed to protecting your privacy and the confidentiality of your Personal Information. "Personal Information" is information that directly identifies or reasonably can be used to identify an individual user of this Website ("Site"). Examples include name, address, telephone number, e-mail address, Social Security number, and financial account number. To notify you about our Site privacy practices, we have developed this Website Privacy Policy. We also recommend that you review the Terms of Use for this Site <https://VFWInsurance.com>, which contains contractual terms governing use of this Site and its content.

1.2. **Your California Privacy Rights.** California Civil Code Section 1798.83 permits our Site visitors who are California residents to request and obtain from us once a year, free of charge, information about the Personal Information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of Personal Information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to: Contracts Compliance Coordinator at Lockton Affinity, LLC, P.O. Box 410679, Kansas City, MO 64141-0679

1.3. All personally identifiable information collected on this Site by Affinity is considered Personal Information ("Personal Information") and will be treated in accordance with this Website Privacy Policy.

1.4. By using this Site and submitting your Personal Information, you agree with and consent to the processing, transfer, usage, and storage of your Personal Information in accordance with this Website Privacy Policy.

2. Our Policies and Practices to Protect Your Personal Information

2.1. Affinity is committed to protecting the privacy of Internet users who visit this Site. Affinity's intent always is to use and, if appropriate, to disclose your Personal Information in a manner consistent with applicable laws and regulations, contractual obligations, and our company's policies and procedures. We protect Personal Information we collect about you by maintaining physical, electronic, and procedural safeguards designed to meet or exceed applicable laws.

2.2. To safeguard your Personal Information, the electronic storage and transmission of Personal Information are secured with appropriate security technologies. Access to this Site's servers is limited to employees, agents, and contractors of Affinity, all of whom are required to preserve the confidentiality of Personal Information they receive while performing their jobs and conducting the business of Affinity.

3. Information We Collect

3.1. Affinity collects two types of information about you when you visit the Site: Personal Information that you provide (including, by way of example, your name and e-mail address) and non-personal, aggregate information (such as cookies with information regarding the pages on our Site that you have visited and your IP address).

3.2. A cookie is a small file, typically of letters and numbers, downloaded onto a device when the user accesses certain websites. Cookies allow a website to recognize a user's device. Cookies are used on our Site for the purpose of compiling web statistics and analyzing how our website users utilize our Site. This use of cookies enables Affinity to identify and implement changes to our Site designed to provide users with a better website experience. The web browser stores this information on disk in the form of a small data file. You may refuse the cookie, if you wish. To do so, you will need to adjust your browser settings.

3.3. When using this Site, you may decide to provide us with Personal Information to help us serve your needs. For example, you may choose to give us your name, e-mail address, and company information in order to use our "E-mail Signup" function to receive e-mails from Affinity concerning company news, compliance issues, and services provided, or in order to use our contact form to send us an inquiry concerning



services provided or other inquiries. If you want to provide comments to Affinity's blogs, you will need to provide your name and e-mail address, and you may also choose to provide your website URL. In addition, you may decide to complete one of the online forms that request Personal Information or otherwise enter Personal Information into the Site for the purpose of obtaining an insurance policy quote. If you choose to purchase a policy online, you may need to provide credit card information. In addition, if you contact us, we may keep a record of that correspondence.

3.4. Affinity is committed to protecting the privacy needs of children and encourages parents and guardians to take an active role in their children's online activities and interests. Affinity **does not** intentionally collect information from children under the age of 13, and Affinity **does not** target its Site to children.

3.5. Affinity is unable to implement Do Not Track ("DNT") features at this time. Please check this Privacy Policy at a later date for updates.

4. Disclosure or Use of Personal Information

4.1. This Site is hosted on web servers in the United States.

4.2. Affinity will not exchange, sell, or otherwise distribute your Personal Information without your consent, except to the extent required by law, in accordance with your instructions, or as identified in this Website Privacy Policy. Further, Affinity has procedures designed to ensure that Personal Information that needs to be transferred for any of these purposes is transferred only to third parties that follow adequate data protection principles. By using this Site and submitting Personal Information to this Site, you consent to the collection, usage, storage, transfer, and disposition of your Personal Information—as set forth in this Website Privacy Policy—for all purposes set forth in this Policy, for all purposes required by law, and as instructed by you. If you do not consent, do not provide any Personal Information via this Site.

4.2.1. Disclosure within Lockton Family of Companies. We may share your Personal Information with companies within the Lockton family of companies. We may use such information to help ensure that the content from our Site is presented in the most effective manner for you and your computer; to provide you with information, products, or services that you request from us or which we feel may interest you; to carry out any obligations arising from any contracts entered into between you and Affinity; to allow you to participate in interactive features of our service (when you choose to do so); and to notify you about changes to our service. By submitting Personal Information through our Site, you consent the transfer to and the processing and usage of your Personal Information within the Lockton family of companies. If you do not consent, do not provide any Personal Information via this Site.

4.2.2. Disclosure to Third-Party Agents and Service Providers, Generally. We sometimes contract with other companies and individuals to perform functions or services on our behalf. For example, Affinity sometimes contracts with entities that host websites; entities that provide marketing assistance; and entities that send e-mail messages and/or make phone calls on our behalf. Other than under the circumstances addressed in 4.2.3 below, such third parties may have access to Personal Information—such as names, e-mail addresses, and telephone numbers—needed to perform their functions, but they are restricted from using such Personal Information for purposes other than providing services for Affinity and are required by Affinity to maintain the confidentiality of such Personal Information. By submitting Personal Information through our Site, you consent to the transfer to and the processing and usage of your Personal Information by Affinity's agents and service providers. If you do not consent, do not provide any Personal Information via this Site.

4.2.3. Disclosure of Tracking Information to Certain Third Party Service Providers. Third parties who provide interactive, social networking (e.g., Facebook's "Like" button) or other features, or who send e-mail messages on our behalf to individuals who are listed in their databases, may use cookies or other methods to track the activity on our Site. Such third parties may use these cookies or other tracking methods for their own purposes by relating information about your visit to our website and/or your purchases with any of your personally identifying information that they may have. By browsing our Site, you consent to the transfer to and the processing and usage of your Personal Information and purchase data by such third parties as set forth in this paragraph, if applicable. If you do not consent, please disable these cookies in your browser or refrain from browsing our Site.

4.2.4. Disclosure to Insurance Companies and Intermediaries. In the event you request a quote for issuance of an insurance policy or seek to purchase insurance through the Site, we may share your Personal Information, including, but not limited to, medical, financial, drivers' license, and/or other Personal Information you choose to provide with insurance companies or intermediaries for purposes of obtaining quotes and placing insurance on your behalf. By submitting your Personal Information via this Site, you consent to the transfer to and the processing and usage of Personal Information, including any sensitive Personal Information, you provide by insurance companies and/or intermediaries. If you do not consent, do not provide Personal Information for purposes of purchasing insurance or obtaining quotes for insurance via this Site.



4.2.5. Disclosure of Credit Card and Debit Card Data to Parties Processing Payment. Further, if you choose to purchase an insurance policy or policies through our Site using a credit card or debit card, then your credit or debit card information will be collected and processed by Affinity and/or Affinity's payment processing vendor. If you choose a recurring billing option to cover payment of future premiums, then your credit card or debit card information will be stored until you cancel recurring billing. Although Affinity takes steps to confirm that its third-party credit and debit card processing vendors have adequate privacy protections in place and requires such processing vendors to comply with all applicable data privacy laws and regulations, Affinity cannot guarantee the data privacy practices of any third party. By submitting your credit card or debit card information via this Site, you consent to the collection, processing, and usage of credit card or debit card information by Affinity and by any third-party vendors assisting with credit and debit card transactions. If you do not consent to this, do not provide credit and debit card information via this Site.

4.2.6. Disclosure to Third Parties in Connection with Legal Matters. Affinity may preserve, and has the right to disclose without your prior permission, any information about you or your use of this Site if Affinity has a good faith belief that such action is necessary to: (a) Protect and defend the rights, property, or safety of Affinity or its affiliates, employees, other users of this Site, or the public; (b) Enforce the terms and conditions that apply to use of this Site; or (c) Respond to claims that any content violates the rights of third parties. We may also disclose information as we deem necessary to comply with any applicable law, regulation, legal process, or governmental request. By submitting Personal Information via this Site, you consent to the processing, transfer, usage, and/or storage of your Personal Information for any such purposes. If you do not consent, do not provide Personal Information via this Site.

4.2.7. Disclosure to Third Parties in Connection with Mergers and Acquisitions. Affinity and/or our Lockton affiliates may disclose your Personal Information to third parties in connection with the sale or purchase of any business or assets. By submitting Personal Information via this Site, you consent to the processing, transfer, usage, and/or storage of your Personal Information for any such purposes. If you do not consent, do not provide Personal Information via this Site.

4.2.8. Disclosure of Blog Comments and Related Personal Information to Third Parties. If you choose to add a comment to any of Affinity's blogs, we will collect your name and e-mail address, along with any Personal Information you choose to include in your comments. Such information may be transferred to the United States and/or other countries not deemed to ensure adequate levels of data protection. Further, in the event we publish your comments on our Site, your name will be published on our Site, along with your comments. By submitting any such comments, you consent to the processing, transfer, usage, and/or storage of your comments, including any Personal Information you provide. If you do not consent, do not submit comments to Affinity's blogs via this Site.

5. External Links

5.1. Our Site includes links to other websites. Please be aware that we are not responsible for the privacy practices of such other websites. We encourage our users to read the privacy statements of each and every website they visit. This Website Privacy Policy applies solely to information collected by Affinity when you visit this Site.

6. Information Storage and Security

6.1. Our systems are configured to provide privacy, integrity, and authentication in Internet communications. The security measures we have taken help to ensure that when you visit our Site, your Personal Information is secure and encrypted, so that a third party cannot capture, read, or access your Personal Information while it is in transit between your computer and our system. However, the transmission of information via the Internet is not completely secure, and although we will do our best to protect your Personal Information, we cannot guarantee the security of information as it is transmitted to our Site. As such, any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to help prevent unauthorized access.

6.2. We limit internal access to our servers and have physical, electronic, and administrative safeguards in place to guard all Personal Information that we receive from visitors to our Site. At Affinity, we adhere to high standards of ethics and integrity in performing our jobs and conducting business. However, it should be noted that there are some things, such as viruses and hacker attacks, which Affinity and other website operators cannot control.

6.3. Affinity disposes of Personal Information in a secure manner by destroying or permanently erasing electronic data, and by disposing of hard copy data via burning, pulverizing, or utilizing shredding methods designed to ensure that Personal Information cannot be read or reconstructed.



7. Accessing, Correcting, or Removing Your Personal Information

7.1. If you would like to review your Personal Information, correct the Personal Information you have provided to us, and/or request that we remove your information from our records, e-mail Contracts Compliance Coordinator at ICustomer@locktonaffinity.com, or write Contracts Compliance Coordinator at Lockton Affinity, LLC, P.O. Box 410679, Kansas City, MO 64141-0679, with the access, correction, or removal request. Each request will be reviewed and responded to in accordance with applicable laws. In order to cover internal costs for responding to access requests, Affinity may charge a reasonable fee to individuals desiring access to their Personal Information.

8. Policy Updates

8.1. This Website Privacy Policy was last updated on December 20, 2013. We reserve the right to make changes to our Website Privacy Policy at any time. We encourage you to periodically review this Site, and its Website Privacy Policy, in particular, for any updates or changes. Affinity will advise users of this Site of material changes to the Website Privacy Policy by posting a prominent notice on the homepage advising that the policy has been revised. Your continued access or use of this Site shall be deemed your acceptance of all terms and conditions contained in this Website Privacy Policy.

9. Contact Information for Questions

9.1. If you have any questions about data privacy and security on this Site and/or concerns about the handling of your personal information, please contact Lockton Affinity's Compliance Counsel via e-mail at compliance@lockton.com or by mail to Lockton Affinity, Attention: Compliance Counsel, 444 W. 47th St., Suite 900, Kansas City, MO 64112.