



# Privacy Policy

## PROTECTING YOUR PRIVACY AND INFORMATION

SBG, Inc. (Strategic Benefits Group, Inc.), (“SBG”), our employees, affiliates, vendors, and associated organizations are committed to protecting your privacy concerning the personal information (“PI”) that we may need to collect as well as helping you understand the information collected and how it is used to support the insurance and financial products we transact. We do not sell your PI to any third party, but we may share it with third parties as necessary to provide you with the products and services you, or your agent, requests us to administer with/through us. SBG provides our customers with a broad range of financial products and services and employs the following practices for collection, use, retention, and security of PI for as long as we have it.

## COLLECTION OF INFORMATION

SBG may be required to collect PI as part of the services provided. The type of PI collected depends on the products or services requested and include some of all of the following sources:

- Information provided by you on applications, new account forms and factfinding questionnaires. This could include your name, address, Social Security number, date of birth, and history concerning financial, health, and employment matters.
- Transactions executed through SBG, our affiliates, and other providers with whom we are contracted with and serve as providers, vendors or other parties, deemed necessary to deliver services to you. We keep information about your transactions, the products you buy, and the amount you paid for those products.
- Information from other sources and/or non-affiliated third parties, including, but not limited to consumer reporting agencies such as credit history, credit scores, driving records, and employment documents. When needed, and with your authorization, we may also collect information, such as medical information provided by other individuals, business, or health-care providers.

## USE AND DISCLOSURE OF INFORMATION

SBG is permitted, under law, to disclose nonpublic PI within our company, and with our affiliates, insurance companies, insurance support organizations, and other certain parties to effectuate your transactions. Your information may be used for identification purposes, to process your requests and transactions, to offer or provide insurance / investment services, to provide customer service, or to analyze in order to enhance our products and services. Information obtained from reports prepared by service providers may be kept by the service provider and shared with other persons; however, we require our service providers to protect your PI and to use or disclose it only for the work they perform for us, or as permitted to them by law. We may disclose information about your application with credit bureaus, regulatory authorities, government entities in response to subpoenas, and others where disclosure is required by law.

## PROTECTION OF INFORMATION

We have a responsibility to keep your information safe and deploy security practices and procedural safeguards to protect your information from unauthorized disclosure or use. Your information is only available to those requiring access to process



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or service your transactions, and those fulfilling compliance, legal or audit functions on our behalf. Individuals who have access to your PI are required to maintain confidentiality and trained on the importance of data privacy. When PI is shared with third parties for the purposes noted above, we ensure there are contractual restrictions and full disclosure of their use of your information.

#### **YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION**

- **Accuracy of information:** We strive for accurate records and ask that you please tell us if you receive any incorrect information from us or if you believe that the PI we have about you is inaccurate, incomplete, or not current by writing to us at the address below. We will make every effort to correct any inaccurate reported information as quickly as possible.
- **Access:** We will inform you as to any PI that we have about you as required by law to provide you ("Disclosable PI"). You may provide a written or phone request to see a copy of your Disclosable PI at any time. At time of request, this information will be provided to you in person, or copy by mail or email, whichever you prefer. We request that you provide us with 45 business days to prepare this information. Note: we will not provide you with information we have collected in connection with, or in anticipation of, a claim or legal proceeding.

#### **CONTACTING US**

If you have questions about this privacy notice you can contact us at:

**SBG, Inc.**  
12701 Whitewater Dr. Suite 200  
Minnetonka, MN 55343  
800.695.2261

\*We reserve the right to change our privacy practices at any time and will provide you a revised notice as required by law.

\*Our privacy practices comply with all applicable laws. If a state's privacy laws are more restrictive than those stated in this notice, we will comply with those laws.

\*Your agent, consultant or advisor may have a different privacy place.