

Privacy Statement

Data We Collect

Cookies - Non-Personal Information

Personal Information & CA Notice at Collection

Your Privacy Rights

How SFG Shares the Data with Third Parties

SFG's Commitment to Data Security

Children

Antidiscrimination

Contact Us

Privacy Statement

Sammons Financial[®] and Sammons[®] Financial Group (SFG) value the privacy of our customers, agents, employees, and website visitors. This Privacy Policy describes how SFG and its Member Companies (Member Companies include Midland National[®] Life Insurance Company, North American Company for Life and Health Insurance[®], Sammons Institutional Group[®], Inc., Sammons Financial Network[®], LLC., and Beacon Capital Management) collect, use, and protect information associated with personal data and what rights you have regarding this activity. If you do not agree with the terms within this Privacy Policy, then you should not access or use the services, websites, applications or any other aspect of SFG business.

This Privacy Policy applies to SFG only and not to third parties that integrate with the services through SFG or third-party products, services or businesses who provide services under their own terms of use and privacy policy. When linking to any third-party site or features, our Privacy Policy 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).

SFG reserves the right to modify this Privacy Policy at any time and in our sole discretion to reflect our current practices and ensure compliance with applicable laws. We recommend that you check this page periodically to stay informed of any changes.

Data We Collect

We collect customer information in different ways. Below is a summary of how we collect data, the type of data collected, and the purpose for collecting. Information we collect is utilized as noted in the table below and is **not** sold to others.

Cookies

SFG websites use “cookies” or similar technologies to collect information about our website visitors, including your browser type, mobile device operating system, browsing behavior, and from what general location (region) you access the website. Some of this information, such as IP address, may be personal. 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 solve technical problems, monitor website performance, and make the website(s) more convenient to use. You can manage your cookie settings and similar technologies through your web browser. You may also want to review and update ad settings and preferences on social media sites.

Log file information is automatically reported by your browser or mobile device each time you access the Service. Our servers automatically record certain log file information. These server logs may include anonymous and aggregated information such as referring/exit pages and URLs, number of clicks, how you interact with links on the Service, landing pages, pages viewed and other similar information.

Personal Information

You do not need to submit personal information to access certain aspects of the website. However, when logging into our site or utilizing a service provided within our site, we collect personal information you provide to us directly, or indirectly via a financial professional (e.g. brokers, agents, advisors and distribution partners).

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

Session Replay

SFG may utilize session replay tools and similar technologies to record your interactions with our website. Information such as keystrokes, mouse clicks and movements, data entry, error messages, and other interactions may be collected and used to improve functionality of our website.

Personal information we may collect, how it is collected and why

This table summarizes the data we are either presently collecting or have collected about consumers in the previous 12-months. This table is intended to comply with **California’s Notice at Collection** requirement. This personal information is collected online or offline when you directly provide it to SFG through your use of our services or from third parties.

| Categories and examples of personal information collected | Purpose(s) of Collection |
|---|--|
| Unique Identifiers* – name, signature, alias, postal address, online identifier, internet protocol address, geolocation, email address, account name, social security number, passport number, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information | <ul style="list-style-type: none"> • Evaluating application for appointment and/or employment and to maintain appointment or employment records; • Evaluating application for and/or to maintain insurance contracts; • Evaluating application and/or to maintain investment accounts; and • Complying with legal or regulatory requirements |

| Categories and examples of personal information collected | Purpose(s) of Collection |
|--|---|
| Government ID and financial information – name and financial account number, driver’s license, social security number, user name and password. | <ul style="list-style-type: none"> • Evaluating application for appointment and/or employment and to maintain appointment or employment records; • Evaluating application for and/or to maintain insurance contracts; • Evaluating application and/or to maintain investment accounts; • Verifying customer’s identity; and • Complying with legal or regulatory obligations |
| Commercial information – records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies | <ul style="list-style-type: none"> • Evaluating application for appointment or employment through background checks and other means, and/or to maintain employment/appointment records; • Evaluating application for and/or to maintain insurance contracts; • Evaluating application and/or to maintain investment accounts; • Verifying customer’s identity; and • Complying with legal or regulatory requirements |
| Biometric information such as fingerprints | <ul style="list-style-type: none"> • Evaluating application for appointment or employment through background checks and other means, and/or to maintain employment/appointment records; and • Evaluating application for and/or to maintain insurance contracts |
| Professional or employment related information | <ul style="list-style-type: none"> • Evaluating application for appointment or employment and/or to maintain appointment records or to issue and/or maintain insurance contracts |
| Education information | <ul style="list-style-type: none"> • Evaluating application for appointment or employment and/or to maintain appointment or employment records |
| Inferences drawn from the foregoing to create a profile about the agent, client, employee, or applicant reflecting preferences or behavior | <ul style="list-style-type: none"> • Evaluating application for appointment or employment and/or to maintain appointment or employment records or to issue and/or maintain insurance contracts |
| Protected classification information – race, gender, ethnicity, etc. | <ul style="list-style-type: none"> • Complying with legal or regulatory requirements during the application process and to maintain employment records • Complying with legal or regulator requirements related to contractors or suppliers that provide products and/or services to SFG and its member companies. |

| Categories and examples of personal information collected | Purpose(s) of Collection |
|--|--|
| Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding an interaction with an internet website, application, or advertisement | <ul style="list-style-type: none"> • Monitoring as it relates to employment: <ul style="list-style-type: none"> ○ to maintaining employment records or ensure compliance with Company policies. ○ Evaluating the performance and usability of our website(s). • Assisting 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 |
| Audio, electronic, visual, or similar information, such as call or video recordings | <ul style="list-style-type: none"> • Assisting in detection or prevention of Security Incidents and monitor for regulatory compliance. • Recording and maintaining client instructions • Performing quality assurance and for training purposes |

*Some personal information included in this category may overlap with other categories.

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

Data Retention

SFG will retain your personal data as long as reasonably required to conduct business with you or needed to service you, or as required by law. We may retain data for purposes such as complying with legal and audit obligations, as well as for backup and archival purposes.

Your Privacy Rights

SFG complies with state privacy laws such as the California Consumer Privacy Act of 2018 (“CCPA”) and all related amendments and regulations. If applicable, consumers or their designated authorized agent may make a request pursuant to their rights by contacting privacyquestions@sfgmembers.com. Upon receiving a request, SFG will verify your request using the information associated with your products or services, including your email address. If there is a need to verify your identity prior to releasing information in accordance with your request, we will contact you at the phone number or email address you provided in your request submission. Government identification may be required.

California Consumer Privacy Act. The CCPA provides an exemption for personal information collected pursuant to the Gramm-Leach-Bliley Act (“GLBA”). When receiving your personal information, we do so only for the purposes of determining our ability to:

- provide or maintain life insurance and financial products,
- authorize you to sell our products as an independent insurance agent, or,
- offer employment.

The CCPA enumerates certain rights to California residents. This section supplements the information contained in our Privacy Policy and applies only to California residents. We adopt this CCPA notice to comply with the CCPA, amendments, and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice. The CCPA contains several exemptions from coverage, including data collected for, processed, sold, or disclosed pursuant to the GLBA.

Right to Know. You have a right to submit a verifiable request, up to two times a year, for the following information:

- the categories of personal information we collected about you*
- the specific pieces of your personal information*
- the categories of sources from which your personal information is collected.
- the purposes for which the business uses the personal information*.
**For examples, please see the table in the “Data We Collect” section*
- the categories of third parties with whom we disclosed your personal information **
***For examples, please see the “How SFG Shares the Data with Third Parties” section*

Right to Delete. Consumers have the right to request the deletion of personal information that has been collected. However, there are exemptions imposed on SFG along with other state and federal laws that may prevent SFG from deleting certain personal information. We may deny your deletion request if retaining the information is necessary for us or our service providers to comply with laws or regulations. We will respond to all requests received under this section consistent with all applicable laws and regulations. If we are unable to fulfill a deletion request, we will tell you why in our response. SFG will not discriminate against you if you choose to exercise your privacy rights.

How SFG Shares the Data with Third Parties

SFG is committed to protecting the information we collect about you. **SFG does not sell any data, including your personal data to third parties.** We may share your personal information to a third party performing contractual services for us or on our behalf for a business purpose, or as required by law. 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 contractual services to us. We may disclose your personal information to the following categories of third parties:

- Service providers with whom we have an active service agreement; and
- Those whom you or your agent authorize us to disclose your personal information in connection with products or services we provide to you.

We may share non-personal, aggregated information with third parties we engage for site administration or reinsurance 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/or privacy policy. You agree to look solely to the applicable third party and not to SFG to enforce your rights in relation to use of the third-party service(s) provided.

SFG’s Commitment to Data Security

At SFG, safeguarding your information is important to us. A wide variety of security technologies and processes have been implemented to prevent unauthorized access, alteration, or disclosure. These processes are based on leading security standards, reviewed on a regular basis, and are subject to audit. They include, but are not limited to:

- Secure storage techniques, including cryptographic controls;
- Secure data transmission methods;
- Access controls, including role-based access;

- Anti-virus protection;
- Malware protection;
- Ongoing security awareness training for all employees and contractors;
- Physical and environmental controls for data centers; and
- Reviews of security practices of vendors.

Unfortunately, no method of transmission over the internet or electronic storage is 100% secure. However, in the unlikely event of a data breach, we have procedures in place to promptly notify affected individuals and take necessary steps to minimize potential impact.

Children

Our services are not directed at children, and we do not knowingly collect personal information from children without a legal guardian's consent. Should we discover that we have inadvertently collected personal information from a child without legal guardian consent, we will promptly delete that information and notify the legal guardian whenever possible. If you believe that a child may have provided us with personal information without legal guardian consent, please contact us.

Antidiscrimination

SFG will not discriminate against you for exercising your privacy rights prescribed to you by laws or regulations. Please note that a legitimate denial of a request for information or deletion is not discriminatory.

Contact Us

Your privacy is important to us, and we are happy to answer any questions. For questions regarding this Privacy Policy, please contact us at privacyquestions@sfgmembers.com, or by calling 1-800-720-3955.