

SMITH DAVIS & ABEL INSURANCE SERVICES

Privacy Policy Notice

As of April 9, 2003

PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about you with a non-affiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing *you* with this document, which notifies *you* of the privacy policies and practices of Smith Davis & Abel Insurance Services.

OUR PRIVACY POLICIES AND PRACTICES

1. Information we collect:

We collect nonpublic personal information about you from the following sources:

- Information we received from you on applications or other forms.
- Information about your transactions with us, our affiliates, or others.
- Information we receive from a consumer-reporting agency.
- Driver Record information.

Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional information will be collected about you.

2. Information we may disclose to third parties:

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

3. Nonaffiliated third parties to whom disclosures may be made:

We disclose nonpublic personal information about you only to nonaffiliated third parties as permitted by law.

4. Our practices regarding information confidentiality and security:

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

5. Our policy regarding dispute resolution:

Any controversy or claim arising out of or relating to our privacy policy, or the breach thereof, shall be settled by arbitration in accordance with the rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction thereof.

6. Reservation of the right to disclose information in unforeseen circumstances:

In connection with the potential sale or transfer of its interests, Smith Davis & Abel Insurance Services and its affiliates reserves the right to sale or transfer you information (including but not limited to your address, name, age, sex, zip code, state and country of residency and other information that you provide through other communications) to a third party entity that (1) concentrates its business in a similar practice or service; (2) agrees to be Smith Davis & Abel Insurance Services' successor in interest with regards to the maintenance and protection of the information collected; and (3) agrees to the obligation of this privacy statement.