

**PRIVACY POLICY
OF
BEAUMONT & STORK INC.
PENN YAN NY 14527**

- I. **PURPOSE** – The purpose of this Privacy Policy, hereinafter referred to as the Policy, is to establish administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of customer information as required under federal and state regulations.

- II. **DEFINITIONS** – For purposes of this policy the following definitions shall apply.
 - (a) "Customer" shall mean any customer of the agency as the term customer is defined in the federal and state regulations.
 - (b) "Customer information" shall mean nonpublic information about a customer, whether in paper, electronic, or other form, that is maintained by or on behalf of the agency.
 - (c) "Agency" shall mean the licensed insurance agency indicated above.
 - (d) "Service provider" shall mean any person or entity that maintains, processes, or otherwise is permitted access to customer information through its provision of services to the agency including, but not limited to, insurance companies and other financial service organizations.
 - (e) "Principal" shall mean any insurance company that has a business relationship with the agency for the purpose of underwriting, quoting and/ or accepting business to be placed by the agency.

- III. **DISCLOSURE OF INFORMATION** – It is the policy of this agency that no customer information as defined herein shall be shared with any nonaffiliated third parties unless such information is required to be disclosed by a court order or subpoena.

- IV. **COLLECTION OF INFORMATION** – The agency shall collect customer information only as required for the purpose of underwriting, quoting and placing insurance and financial service products with affiliated Principals.

- V. **SAFEGUARDS TO PROTECT CUSTOMER INFORMATION** – It is the policy of this agency that all customer information shall be protected against unauthorized access to the information collected, including that held in electronic format on agency computer systems. The agency shall maintain physical, electronic and procedural safeguards to protect all customer information.

- VI. **INTERNAL ACCESS TO INFORMATION** – Access to customer information shall be limited to employees who need the information to provide customers with products and services. All employees are expected to protect customer information from inappropriate access, disclosure and modification.

- VII. **CUSTOMER ACCESSES TO INFORMATION** – A customer shall have the right to review their information in the agency files subject to the following.
 - (a) The customer must make a request to see the information in writing indicating complete name and address, the specific policy numbers relating to the request, and specifically what the customer would like to see.
 - (b) There may be some kinds of information that the agency will not share with the customer.
 - (c) If a customer believes that certain information is not correct and advises the agency in writing as to what is incorrect and why, the agency shall reinvestigate

the information in question. If the agency agrees that the information should be corrected the agency shall make the correction and if appropriate, shall notify parties to whom the inaccurate information was previously disclosed. If the agency does not agree that the information is incorrect the agency shall explain why by providing the customer with an explanation. If the customer does not agree the customer shall have the right to place a written statement in the file to that effect.

VIII. **CUSTOMER INFORMATION RISK MANAGEMENT AND CONTROL**

ASSESSMENT – To identify any reasonably foreseeable internal and external threats to the security of customer information that could result in the disclosure, misuse, alteration or destruction of customer information or customer information systems the agency will take step to ensure the following.

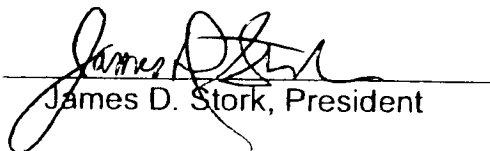
- (a) Ensure the security of all computer systems so that customer information can be accessed only by trained employees through the use of security codes and passwords.
- (b) All employees will be trained and advised of the policy of the agency with respect to customer information. Only employees who are required by their duties and customer affiliation will have access to customer information.
- (c) Agency will maintain a complete computer backup system to recover customer information stored in the system in the event of damage to or destruction of the system.
- (d) From time to time test the controls, systems and procedures that are put in place to safeguard customer information.
- (e) Monitor the systems, evaluate the effectiveness of the information security programs and make adjustments relevant to changes in technology or changes in the business and any new internal or external threats to the security of customer information.

- IX. **NOTIFICATION** – If it becomes necessary for the agency, in compliance with the Federal and State laws and regulations relating to the notification requirements, the agency shall use the appropriate generic documents developed by the Independent Insurance Agents Association of New York, Inc. and available on their website. The agency adopts and incorporates herein by reference the notification policies and procedures of the insurance companies and financial service providers or other principles that are affiliated with the agency for business purposes that may have access to customer information.

Adopted this 1st day of June, 2002.

Beaumont & Stork, Inc.

By:


James D. Stork, President