

## Privacy and Security Policies & Procedures

These privacy policies and procedures implement our obligation as an insurance office to protect the “nonpublic personal information” that we create, receive or maintain on consumers or customers.

1. **No use or disclosure:** Myers-Stevens-Mello & Co., Inc. will not use or disclose nonpublic personal information except as these Privacy Policies & Procedures or our annual privacy practices notice permit, require or as permitted by law.
2. **Medical Information Policy:** Myers-Stevens-Mello & Co., Inc. will not disclose or share medical or other specified information at any time as defined in CIC Section 791.13(k) with out an expressed written consent from the consumer/customer.

A consumer/customer may at any time revoke their consent to disclose or share information by written notice. The revocation will be placed in the consumer/customers file and notations made in any electronic records.

3. **Exemption to Consent:** Myers-Stevens-Mello & Co., Inc. may disclose or share nonpublic personal information without express notice or consent in the course of performing an insurance or financial function or transaction authorized by the consumer/customer or as permitted in CIC Section 791.13.
4. **Notice of Privacy Procedures:** Myers-Stevens-Mello & Co., Inc. provide an initial and annual Privacy Practices Notice to each customer as required by CIC Section 791.13 and Title 10 California Code of Regulations Sections 2689.1 to 2689.24 and to all consumers before disclosure of any nonpublic personal financial information to nonaffiliated third parties. We will promptly revise our Privacy Practices Notice when there is a material change to our use or disclosure of nonpublic personal information, nonpublic personal financial information, legal duties, consumers or customers rights or to other privacy practices that render the statements in that notice no longer accurate.

The notices are available upon request.

Opt-out notice: Each customer/consumer will receive their initial privacy practices notice prior to disclosure and or sharing of their nonpublic personal financial information with nonaffiliated third parties as required by CIC Section 791.13 and Title 10 California Code of Regulations Section 2689.8. Additionally they will receive an opt-out notice a minimum of 30 days, before any sharing or disclosure of nonpublic personal financial information with any nonaffiliated third party as required by CIC Section 791.04 and Title 10 California Code of Regulations Section 2689.8 (f). A consumer may exercise the right to opt-out at any time by completing our opt-out form and returning it to us. Myers-Stevens-Mello & Co., Inc. will include the completed opt-out form in the consumer’s physical file and make the appropriate notation and changes to their electronic records. Myers-Stevens-Mello & Co., Inc. will not share or disclose any customer/consumer nonpublic personal financial information with any person except as allowed under CIC Section 791.13 or with written consent once we receive a completed opt-out notice.

A consumer/customer may at any time revoke their opt-out by written notice. The revocation will be placed in the consumer/customers physical file and notations made in any electronic records.

5. **Distribution of Our Notice:** Each customer will receive his or her initial privacy practices notice from this office no later than the delivery of an insurance policy, service or financial product. Each customer will receive a notice annually on the date established by us, which reflects our current privacy practices. This annual privacy notice supersedes all prior initial or annual notices.

6. **Minimum Necessary Disclosure:** Myers-Stevens-Mello & Co., Inc. will make reasonable efforts to protect consumer/customer privacy by disclosing or sharing the minimum necessary nonpublic personal information to accomplish the intended function, transactions, or service.
7. **Customer/Consumer Rights:** Myers-Stevens-Mello & Co., Inc. will honor customer's and consumer's rights regarding their nonpublic personal information.
  - a. **Access:** Myers-Stevens-Mello & Co., Inc. will honor requests in writing to view and copy customer/consumer record that are reasonably identified, reasonably locatable and retrievable. We will within 30 days of receipt of the request contact the customer/consumer and inform them of the nature and substance of the recorded information and make arraignments for them to view the information and make copies for them for which we will charge \$25.00 per page plus \$25.00 per hour for staff time. We will also disclose to the individual the identities of those persons with whom we have shared or disclosed the customer/consumers nonpublic personal information.
  - b. **Amendments –** Customers/consumers have the right to request an amendment, correction or deletion to their nonpublic personal information held by us. Myers-Stevens-Mello & Co., Inc. will, within 30 days of such request, inform the customer/consumer of our decision to amend, correct, or delete or our decision to not – amend, correct or delete. If we decide to amend, correct or delete we will notify the customer/consumer “in writing and will additionally notify those persons whom we shared of disclosed the original information to.

If we decide not to make any changes the customer/consumer has a right to submit in writing a concise statement setting forth what the customer/consumer thins is the correct, relevant or fair information and why they disagree with our refusal to amend, correct, or delete nonpublic personal information in their file. Myers-Stevens-Mello & Co., Inc. will put this statement in the customer's/consumer's file. In the future if we share or disclose any nonpublic personal information from the file we will also furnish a copy of the customers/consumers request to amend correct, delete, or letter informing them of our decision and their response.

The rights granted in this section do not extend to information about the customer/consumer that relates to and is collected in the connection with or in reasonable anticipation of a claim or civil or criminal proceeding involving them.

8. **Privacy Officer:** Myers-Stevens-Mello & Co., Inc. will designate one person to be the Privacy Officer. He or she will have primary responsibility for privacy and security issues. He or she will also be the contact for all complaints involving privacy or security matters.
9. **Staff Training:** Our insurance office will train all members of our workforce in these Privacy Policies & Procedures, as needed and appropriate for them to carry out their functions. All members of our workforce will acknowledge in writing within a reasonable time of employment their receipt and training on these Privacy Policies & Procedures.
10. **Data Safeguard:** Myers-Stevens-Mello & Co., Inc. will develop, implement, annually review and maintain reasonable and appropriate administrative, technical and physical safeguards to ensure the integrity and confidentiality of the nonpublic personal information we hold and maintain.
  - a. **Physical Access -** Myers-Stevens-Mello & Co., Inc. will monitor and ensure that during normal business hours no person is unescorted or unmonitored within the office unless they are an employee or a business associated with whom we have a contract that appropriately limits their use and disclosure of nonpublic personal information held or maintained by this office.

Myers-Stevens-Mello & Co., Inc. will identify, monitor and control who is authorized to possess and who possess keys or the necessary codes for securing and entering the office. Upon any termination of employments keys will be collected and codes changed to maintain the security of the office.

- b. Business Associates: Myers-Stevens-Mello & Co., Inc. will obtain a written contract from all nonaffiliated third parties who will have access to or receive nonpublic personal information in the course of their duties for us. This contract "I provide for appropriate safeguards and limit their use and disclosure of the nonpublic personal information we share or disclose to them.
- c. Physical Data: Myers-Stevens-Mello & Co., Inc. will secure all physical data that contains nonpublic personal information. All file containers will be secured when the office is closed or not occupied.
- d. Electronic Data: Myers-Stevens-Mello & Co., Inc. will provided controls on access to and authentication of persons using electronic data. Myers-Stevens-Mello & Co., Inc. will install, maintain and update necessary virus protection, firewall protection and software updates as needed.

All employees who must have access to electronic data will have their own unique user ID and unique password. These will be controlled and changed periodically by the Privacy Officer as needed for employee terminations, updates, new software, etc.

Myers-Stevens-Mello & Co., Inc. will ensure that floppies, CDs, DVDs, zip drives, hard drives, electronic tape, off-site storage etc. are included in the access and authentication procedures. We will ensure that the intentional destruction of data is done using a secure method.

- e. Employee training: Myers-Stevens-Mello & Co., Inc. will provide annual training on the Privacy Policies and Procedures for protecting the electronic data or form or nonpublic personal information we hold or maintain. We will document the time, date, persons in attendance and subjects covered.

11. **Annual Security Assessment:** Myers-Stevens-Mello & Co., Inc. will do an annual Cal-GLBA Privacy and Security Gap Assessment to ensure these policies and procedures are being performed and working as intended. Our Security Officer will initiate the assessment.