



WILLIAM GALLAGHER ASSOCIATES INSURANCE BROKERS, INC.

PRIVACY POLICY NOTICE

PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) and the laws of the State of Massachusetts generally prohibits us from sharing nonpublic personal information about you with a third party unless we provide you with this notice of our privacy policies and practices, such as the type of information that we collect about you and the categories of persons or entities to whom that information may be disclosed. In compliance with the GLBA and the laws of this State, we are providing you with this document, which notifies you of the privacy policies and practices of William Gallagher Associates Insurance Brokers, Inc. The laws of this State further require that we inform you that we may not share your personal information with a nonaffiliated third party for any purpose that is not specifically authorized by law unless we obtain your affirmative permission.

OUR PRIVATE POLICIES AND PRACTICES

1. Information we collect:

A. Categories of Information Collected and Sources From Which We Collect It

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

- Information we receive from you on applications or other forms such as name, address, social security number, etc.
- Information about your transaction with us, our affiliates or others such as coverages, premiums, etc.
- Information we receive from a consumer-reporting agency such as credit and payment history.
- Information we receive from the Registry of Motor Vehicles such as motor vehicle reports.
- Information we receive from medical records or medical professionals.
- We may also collect nonpublic personal information when you use our corporate website.

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

B. Persons From Whom Information is Collected

We may collect nonpublic personal information from individuals other than those proposed for coverage.

C. Information From Credit Reports or Investigative Consumer Reports

If you authorize us to do so, we may obtain information about you from credit reports or other investigative consumer reports prepared by third parties at our request. If you authorize us to request such information and we do request such information, you should be aware that:

- You have the right to request to be interviewed in connection with the preparation of such a report.
- Upon request, you are entitled to receive a copy of the report.
- The information obtained from the report prepared by the third party may be retained by the third party and disclosed to other persons

2. Information we may disclose to third parties:

In the course of our general business practices, we may disclose the information that we collect (as described above) about you or others without your permission to the following types of institutions for the reasons *described*:

- To a third party if the disclosure will enable that party to perform a business, professional or insurance function for us;
- To an insurance institution, agent, or credit reporting agency in order to detect or prevent criminal activity, fraud or misrepresentation in connection with an insurance transaction;
- To an insurance institution, agent, or credit reporting agency for either this agency or the entity to whom we disclose the information to perform a function in connection with an insurance transaction involving you;
- To a medical care institution or medical professional in order to verify coverage benefits, inform you of a medical problem of which you may not be aware, or conduct an audit that would enable us to verify treatment;
- To an insurance regulatory authority, law enforcement, or other governmental authority in order to protect our interests in preventing or prosecuting fraud, or if we believe that you have conducted illegal activities;
- To a group policyholder for the purpose of reporting claims experience or conducting an audit of our operations or service;
- To an actuarial or research organization for the purpose of conducting actuarial or research studies.

3. Notification That Certain Disclosures Require Your Authorization:

As we have indicated in this Privacy Policy Notice, we collect certain personal information about you, and we may disclose that information to certain nonaffiliated third parties. We are permitted by law to disclose your personal information in the circumstance described in paragraph 2 without your permission. **FOR ALL OTHER DISCLOSURES, WE ARE REQUIRED TO OBTAIN YOUR AUTHORIZATION.** The disclosures that first require your authorization are described in more detail on a separate authorization form that we will provide to you.

4. Your Right to Access and Amend Your Personal Information

You have the right to request access to the personal information that we record about you. Your personal right includes the right to know the source of the information and the identity of the persons, institutes or types of institutions to whom we have disclosed such information within 2 years prior to your request. Your right includes the right to view such information and copy it in person, or request that a copy of it be sent to you by mail (for which we may charge you a reasonable fee to cover our costs). Your right also includes the right to request corrections, amendments or deletions of any information in our possession. The procedures that you must follow to request access to or an amendment of you information are as follows:

To obtain access to your information: You should submit a request in writing to James P. Smith, Principal, William Gallagher Associates, 470 Atlantic Ave. Boston, MA 02210. The request should include your name, address, social security number, telephone number employer ID number, and the recorded information to which you would like access. The request should state whether you would like access in person or a copy of the information sent to you by mail. Upon receipt of your request, we will contact you within 30 business days to arrange providing you with access in person or the copies that you have requested.

To correct, amend, or delete any of your information: You should submit a request in writing to the individuals as previously noted. The request should include your name, address, social security number, telephone number, the specific information in dispute, and the identity of the document or record that contains the disputed information. Upon receipt of your request, we will contact you within 30 business days to notify you either that we have made the correction, amendment or deletion, or that we refuse to do so and the reasons for the refusal, which you will have the opportunity to challenge.

5. Our Practices Regarding Information Confidentiality and Security:

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

6. Our Policy Regarding Dispute Resolution:

Any controversy or claim arising out of or relating to our private 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.

7. Reservation of the Right to Disclose Information in Unforeseen Circumstances:

In connection with the potential sale or transfer of its interests, William Gallagher Associates, and its affiliates, reserves the right to sell or transfer your information (including but not limited to your address, name, age, sex, zip code, state and country or 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 serve; (2) agrees to be William Gallagher Associates' successor in interest with regard to the maintenance and protection of the information collected, and (3) agrees to the obligations of this privacy statement.