

PRIVACY POLICY

Gallagher Bassett Services, Inc. (“we”/ “our”/ “our company”) take our client’s (“you”/ “your”/ “your company”) privacy seriously. Because we value our customer relationships, we do not sell customer information. We will only share your information for the purposes of providing services which you have engaged us to perform on your behalf, such as handling your claims and/or providing you with insurance-related products and/or services, as applicable, and as otherwise permitted or required by law.

This Privacy Policy outlines our information sharing practices to help you understand how we protect your privacy, when we collect and use information about you and your employees and operations, and the measures we take to protect the confidentiality of that information.

Your Confidential Information

Your Confidential Information includes, but is not limited to, Protected Health Information, Non-Public Personal Financial Information, and/or Trade Secrets. We do not sell your Confidential Information to others under any circumstances. However, we may provide certain non-personally identifiable information to data clearinghouses in order to assist them in compiling broad based risk information for the benefit of the entire industry.

We collect only that amount of Confidential Information which you choose to provide to us and which we need to properly operate our business. If at any time this policy changes, those changes will be posted on this page of our Web site so that you are aware of our intent to better protect your privacy.

Confidentiality Practices

We support the concept of non-disclosure of your Confidential Information and protect it as we protect our own. We also hold our business associates and our affiliates to similar confidentiality standards. Your Confidential Information must be used and disclosed in a manner consistent with applicable laws and regulations, contractual obligations, and our company’s policies and procedures.

Protected Health Information is defined as individually identifiable health information that is held or transmitted by our company in performance of our contractual obligations with clients. This type of information includes information in electronic, paper and oral form. Protected Health Information may be used and disclosed solely for our company’s business activities related to health care operations.

Non-Public Personal Financial Information is defined as including confidential information of a financial nature that is shared by a current, prospective or prior client

with us in the course of providing products and services to that client. This type of information is not otherwise available to the public and includes, but is not limited to, the following: credit history, financial benefits, business records, accounting information involving the client, contracts in which the client is a party, claims which the client is a party to, client's policy information, and any other data of the client that is financial in nature.

Trade Secrets are defined to include any proprietary information of our current, prospective or prior client that is obtained through the course of our business activities with that client, through the provision of products and services provided by us to the client. This information is not otherwise available to the public and includes, but is not limited to, the following: business records, contracts, claims, products, business methods, data processing procedures, marketing strategies, pending projects or proposals, mailing lists, and any other information related to a client's activities, products or services, which may or may not be protected by the United States Patent and Trademark Office.

Information We Collect

We know how important your privacy is to you and we appreciate you trusting us to handle your Confidential Information responsibly and with integrity. We collect Confidential Information about you and your employees and operations as required to operate our business, including, but not limited to, the following:

- Information we receive related to claim handling, such as your or your employee's occupation, employer, social security and driver's license numbers, Protected Health Information, Non-Public Personal Financial Information and Trade Secrets.
- Information about you or your employee's transactions with us, our affiliates, or previous insurers or employers, such as you or your employee's policy coverage, claim information, premiums and payment and claim history.

In the course of conducting our business, we may share information you or your employees provide to us strictly on an as-needed basis or otherwise required by law. In certain situations, and in no event contrary to applicable public policy, we would share information about you to: 1) our affiliated companies in order to provide a service to you; 2) a third party if reasonably necessary to enable them to perform services for us, such as claims inquiries, appraisals, or the detection of fraud or material misrepresentations; 3) governmental authorities only to the extent that we are required to disclose any such Confidential Information pursuant to the legal process we receive from such governmental authority; 4) persons or organizations conducting legitimate research.

Online Tracking

Click Streams

We may capture click streams to help us learn what parts of our Web site are most popular and among which audiences. We may also use them to help us optimize our user interface, to analyze site usage statistically, to improve content, and to customize our Web site's content and layout. In short, we use this information to allow us to tailor our Web site and to meet your needs better. We analyze click stream data to track trends and behaviors, not individuals. We are interested in our audience size, return visit rate, and similar data on an aggregate basis. We also capture date and time information of visits, pages visited, and the time you spend with us.

Cookies

Cookies are pieces of information that a Web site transfers to your computer's hard drive for record-keeping purposes. They can make the site more useful by storing information about your preferences at our Web site. It is almost standard for any interactive Web site to use cookies. Cookies do not identify a user, but they do identify a user's computer. Most browsers are set up to accept cookies. If you prefer, you can set your browser to refuse cookies, but some online services on our Web site will not function without them.

We do not use cookies to track or report on activity when you are not on our Web site or to provide such information to other parties. We do not use cookies to collect personal information such as your e-mail address, and we do not combine information collected through cookies with your Confidential Information. We make no attempt to look at or examine other cookies or information that may be stored on your computer.

Information We Share

We do not use, disclose, sell or transfer any Confidential Information without consent unless required or permitted by law or regulation. In cases of permitted disclosure, we will disclose information in compliance with applicable laws and regulations and will require the recipient to protect the information and use it only for the purpose provided.

Information Security

We restrict access to your Confidential Information to our employees who need to know such information in order to provide you with the insurance products or services which you have engaged us. We maintain physical, electronic, and procedural safeguards that comply with U.S. federal and state regulations to guard your Confidential Information.

Be aware that e-mail messages sent in clear text over the public Internet can be observed by an unintended third party. Non-encrypted Internet e-mail communications may be accessed and viewed by other Internet users without your knowledge and permission while in transit to us. If you wish to keep your information private, please do not use

electronic mail to communicate information to us or request information from us that you consider to be Confidential and/or proprietary. If you wish, you may contact us instead via telephone at the phone number provided elsewhere in this Web site.

Links to Other Sites

We may provide links to other Web sites not owned or controlled by us that we think might be useful or of interest to you. We are not, however, responsible for the privacy practices used by other Web site owners or the content or accuracy contained on those other Web sites. Links to other Web sites do not constitute or imply endorsement by us of those Web sites, any products or services described on those Web sites or any other material contained in them. Contact those Web sites directly for their individual privacy policies.

Changes to Our Privacy Policy

We reserve the right to make changes to our Privacy Policy at any time. We encourage you to review the Web site and the Privacy Policy in particular periodically for any updates or changes. Your continued access or use of this Web site shall be deemed your acceptance of all terms and conditions contained in this Privacy Policy.