



Winged Keel Group and its affiliates value your privacy.

The collection and use of personal information is fundamental to our ability to service you as our client. We collect and use personal information for such purposes as assisting with a request for insurance, administering our products or services, assisting with claims, processing requested transactions, and offering additional financial products or services.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we are doing everything we can to maintain that trust.

The following points provide an overview of Winged Keel Group's Privacy Policy. Throughout this document, we refer to information that personally identifies you or your accounts as "personal information."

**1. We do not sell your personal information to anyone.**

**2. We do not disclose personal information to third parties, unless one of the following limited exceptions applies:**

We may disclose personal information such as account and transaction data to companies, including financial institutions, that contract with Winged Keel Group to issue policies, execute transactions, act in a custodial capacity, etc. We have contracts with these companies that obligate them to use your personal information only for the purpose of executing the specific services we have requested.

We may disclose personal information to companies that help us process or service your transactions or account(s). We have contracts with these companies that obligate them to use your personal information only for the purpose of executing the specific services we have requested.

We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required by law. (For example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit/authentication checks, etc.)

The insurance companies we work with on your behalf may make a brief report to the Medical Information Bureau (MIB), a non-profit membership organization of life insurance companies, which operates an information exchange on behalf of its members. If you apply to another MIB member company for life or health insurance coverage, or a claim for benefits is submitted to such a company, the MIB, upon request, will supply such company with the information in its file. Similarly, the insurance company or its reinsurers may release information in its file to other life insurance companies to which you may apply for life or health insurance or to which a claim for benefits may be submitted. They may also disclose personal information to your doctor if they find a serious health problem you do not know about. Further, they may contract with a consumer reporting agency to prepare an investigative consumer report and this agency may keep the information it has gathered and disclose it to others.

We may share personal information with affiliated companies and regulatory agencies. For example, Winged Keel Group is a Member Firm of M Financial Group and may offer securities and other investment services through M Holdings Securities, Inc. ("M Securities"), a subsidiary of M Financial Group. M Securities is a registered broker-dealer and investment advisor and is required by various regulatory authorities such as the U.S. Securities Exchange Commission ("SEC"), the Financial Industry Regulatory Authority (FINRA), and state jurisdictions, to collect, through Winged Keel Group, review, and maintain certain personal information such as investment history, financial data, and employment history in order to fulfill various regulatory requirements.

**Outside of these exceptions, we will not share your personal information with third parties unless you have specifically authorized us to do so.**

**3. We do collect personal information in the normal course of business in order to administer your accounts and serve you better.**

Most of the information we collect is obtained directly from you or your representative when applying for our products or services. For insurance products, we may collect information pertaining to a person's health, occupation, avocations, or other personal characteristics. We also collect information that you provide to us when you open an account, make an application through Winged Keel Group for the purchase of a securities product or service, or to register for one or more of our services such as a financial analysis. The information we collect may include name, address, phone number, business address, business phone number, email address, Social Security number, date of birth, marital status, financial information, and information about your investment objectives and experience.

*Information from Third Parties.* If we need to verify information or need additional information, we may obtain information from third parties (e.g., consumer reporting agencies, employers, plan sponsors, third party administrators, insurance companies, etc.).

Personal information collected from you and third parties may vary depending upon the type of policy or service for which you apply. We typically only collect medical information in connection with underwriting insurance policies or as may be necessary for claim settlement purposes.

**4. We protect the confidentiality and security of your personal information.**

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

We restrict access to personal information to select employees and agents who have a need for such information for business purposes only. All such employees are trained and required to safeguard such information.

We maintain physical, electronic, and procedural safeguards to guard your personal information.

**5. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**

If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records and better serve you.

**6. We will provide notice of changes in our information-sharing practices.**

If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to decline such disclosure.

Please contact Barbara Novak at 212.527.8000 or [bnovak@wingedkeel.com](mailto:bnovak@wingedkeel.com) if you have any questions about Winged Keel Group's Privacy Policy.