



The Guardian Corporate Family includes:

- The Guardian Life Insurance Company of America
- RS Investment Management Co. LLC
- Guardian Investor Services, LLC
- Park Avenue Life Insurance Company
- Berkshire Life Insurance Company of America
- Hanover Acquisition LLC
- Family Service Life Insurance Company
- Managed DentalGuard, Inc.
- The Guardian Insurance & Annuity Company, Inc.
- First Commonwealth, Inc
- Innovative Underwriters, Inc.
- Sentinel American Life Insurance Company

At Guardian, we value every aspect of our relationship with you, and nothing could be more important to that relationship than maintaining your trust and confidence. We take our responsibility to protect your personal information very seriously. The purpose of this notice is to make you aware of our policies and procedures for collecting, disclosing, and safeguarding the information that our current and former customers provide to us.

We collect the personal information of our customers from the following sources:

- Applications or other forms, such as policies, where we obtain items such as your name, date of birth, etc.;
- Your transactions with us and our affiliates, such as premium payments;
- Consumer reporting agencies and other similar sources relating to creditworthiness; and
- Our internet websites, where we capture items that you provide when you fill out forms.

To better serve you, the law provides for the disclosure of certain information we collect as follows:

- With affiliates to administer your policy or account, or to give you information about other products and services that may be of interest to you. We may also share non-credit-related information with affiliates to develop marketing programs. We may do this without obtaining prior authorization and the law does not allow customers to restrict these disclosures.
- We may also share your information with our affiliates about your transactions and experiences with us, such as payment history.
- With your agent, broker, or representative in order to service your policy or account.
- With non-affiliates in order to administer your policy or account or to administer our business.
- With non-affiliates with whom we have a joint marketing agreement, such as other financial companies, in order to send you information about products and services. We require all non-affiliates to keep your information confidential. We do not share your information with non-affiliates for any reason other than those stated above.

We may also share your information if the law permits or requires sharing, such as during the investigations of public authorities.

IMPORTANT: WHY YOU ARE RECEIVING THIS NOTICE

We are required by federal law to provide this notice upon the establishment of our relationship with you; furthermore, we must provide this notice annually so long as you have a policy, contract or other type of account with one or more of the entities listed in the Guardian Corporate Family. This requirement applies regardless of whether or not we share any of your information.

CONFIDENTIALITY AND SECURITY

Under federal law, certain disclosures may require us to allow you to “opt-out” (i.e. allow you the option to prohibit certain types of information sharing). If we are considering a disclosure that would trigger your right to opt-out, we will allow you to do so before your information is shared.

Any health information collected by us requires you to complete a separate authorization. We will not disclose your health information to anyone without your authorization, unless the law permits or requires us to do so.

Access to your personal information is restricted to only those Guardian employees who need it to perform the services required of your policy or account. We have physical, electronic, and procedural safeguards that comply with applicable federal and state regulations to keep your personal information safe. If you decide to end your relationship with a member of the Guardian Corporate Family, or if your policy or account becomes inactive for some other reason, we will continue to treat and safeguard your information as described in this notice.

The accuracy of your information is important to us. You have the right to access and to seek correction of your information. You also have the right to request a record of any subsequent disclosures of your information. You may contact us at the address below to receive more information regarding these rights or to receive a more detailed explanation of our privacy policies.

Visit us at <http://www.guardianlife.com/Privacy-Policy> where Group planholders may also access Guardian’s HIPAA Privacy Policy; paper copies are available upon request. We ask that Group planholders share this information with their plan participants.