



Privacy Policy And Notice of Privacy Practices

Protecting Your Information Vita recognizes that your personal information is yours, not ours. We are committed to protecting your privacy and our policies and practices are designed to do just that. *We never rent or sell your personal information to anyone.*

Technology and Information The insurance and financial services industries are rapidly being shaped by technology that is changing the way we do business. To be successful we must continue to ensure that our customers are confident in our ability to manage their affairs in a manner that protects each individual's right to privacy.

Vita Companies customers have access to a broad range of products and services, from basic investments and insurance to Section 125 and COBRA administration. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain information.

Information We Collect or Retain About You We collect personal, financial and health related information that is necessary for the processing of claims, for underwriting or applying for insurance, for securing investments, fulfilling legal and regulatory requirements, and for assisting clients with policy or administration questions. The type of information we collect and maintain varies according to the products or services we provide for you or your employer.

We maintain pertinent personal identifying data (such as name, birth date, Social Security Number, and marital status) as well as financial information and historical information on policies, plans or investments. We also maintain records on any health conditions disclosed or provided to us in other forms in the process of securing group or individual insurance, while assisting on an insurance policy question, or by an insurance company or health provider's office.

We may collect non-public personal information as well as protected health information about you from many sources, including information we receive about you on applications or other forms, information about your transactions with us, our affiliates or others, and information we receive from non-affiliated third parties, including consumer reporting agencies.

Information About You that We May Disclose When it comes to sharing customer information with unaffiliated companies, Vita places strict limits on who receives specific information about customer accounts and other personally identifiable financial data and protected health information. Vita may share information with such companies if they provide a product or service that may benefit our clients or that our client has requested. We will only share such information in the course of fulfilling a business obligation. Whenever we do this we carefully review the company and the product or service to make sure that it provides value to our customers.

We share the appropriate information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products or service to our customers, in the normal course of business when legally required or permitted in connection with fraud investigations and litigation, in connection with acquisitions and sales, and at the request or permission of a customer. We may also share your information with third parties with whom we contract to perform functions on our behalf.

Protection of Shared Information Vita recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against unauthorized access to customer information and protected health information. Therefore, we have established appropriate physical, electronic, and procedural security safeguards and standards to guard against any unauthorized access to customer information.

If we provide personally identifiable information or protected health information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

When we make information available to you over the internet we use internet data encryption technology, personalized passwords, and other precautions.

Electronic Mail Vita uses electronic mail extensively to

- Transmit flexible spending arrangement Explanations of Benefits and account statements and resolve claim issues.
- Conduct COBRA eligibility, enrollment, and payment correspondence with carriers.
- Resolve employee benefits claim issues and correspond about eligibility, enrollment, and payment with carriers and employer clients.

We never use e-mail for solicitation or advertising. Vita never sells or otherwise makes available your e-mail address to anyone except as may be necessary to provide our products and services to our customers.

Protecting Your Personal Information We want to assure all of our clients that whenever personal information is used, it is done with discretion. Safeguarding our clients' personal information is a very high priority. We maintain physical, electronic and procedural safeguards that protect your information. The following policies guide us in protecting our customers' privacy:

- At Vita, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. While information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust.
- Vita limits the use, collection and retention of customer information to what we believe is necessary or useful to conduct our business, provide high-quality service, and offer products and services.
- At Vita, employee access to personally identifiable information and protected health information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information. Because of the importance of these issues, all Vita employees are responsible for maintaining the confidentiality of customer information. Employees who violate these policies are subject to disciplinary action.

For inquiries, please call or write to us:

The Vita Companies

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*Securities offered by Liberty Group, LLC,
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