

Stifel Nicolaus Privacy Policy Personal Health Information

At Stifel Nicolaus, we have in place written procedures and safeguards to protect the personal health information (PHI) of our clients from unauthorized disclosure to third parties in order to comply with the Health Insurance Portability and Accountability Act of 1996. Access to your personal health information is limited to those persons who need it to conduct our business. Our PHI privacy policy applies to both current and former clients.

Client Information Collected by Stifel Nicolaus

Stifel Nicolaus may collect personal health information about you as a precondition for your purchase of insurance or annuity products, to verify your identity, and to comply with state and federal laws. Stifel Nicolaus collects this PHI data through paper applications, as well as electronic and telephone communications. The PHI data we collect varies for different financial products and services and may include:

- Your legal name, date of birth, address, telephone number, and Social Security Number or other Tax ID number
- Your current occupation and income
- Your financial goals and objectives
- Your assets and liabilities, insurance, savings, and investments
- Your health history, high risk hobbies/activities, and foreign travel
- Your motor vehicle driving history
- Information about the financial products and services you purchase from us

Stifel Nicolaus obtains most of this information from its clients. The insurance and annuity companies with whom Stifel Nicolaus maintains selling agreements may see additional PHI during the underwriting process and may contact:

- Physicians, hospitals, and other health care providers
- The Medical Information Bureau, Boston, Massachusetts (a non-profit group of insurance carriers)
- Your employer, attorney, accountant, and bank
- Credit reporting agencies
- State and federal agencies

Your personal health information, insurance rating, and credit status are factors used solely to underwrite and administer the insurance or annuity products you purchase through Stifel Nicolaus.

Sharing of Client Information by Stifel Nicolaus

During the course of medical and financial underwriting directly related to your purchase of insurance, an annuity, or related products, Stifel Nicolaus may share your personal health or financial information with:

- Your attorney or accountant
- Companies whose insurance, annuity, or other products and services you seek to purchase through us
- Companies which have joint marketing agreements with us
- Medical support service companies and other third parties that provide Stifel Nicolaus with support in the areas of:
 - Medical and financial underwriting
 - Claims management
 - Printing and mailing of account statements
 - Technical and computer systems support
 - Clearing and settling trades

Stifel Nicolaus vendors are required to keep client financial and PHI data confidential and to use appropriate security measures to protect it. They must also agree in writing to use personal client data only to provide services to Stifel Nicolaus.

Stifel Nicolaus may need to disclose your confidential financial or personal health information to government agencies, as part of legal proceedings in a court of law or any administrative agency regulating the insurance or securities operations of our firm, and others as required or permitted by state and federal laws. Stifel Nicolaus or the insurance and annuity carriers with whom it maintains selling agreements may disclose personal health information about you to the Medical Information Bureau in Boston, Massachusetts as it relates to medical underwriting for insurance or annuity products.

This privacy policy applies to all Stifel Nicolaus financial advisors, employees, and affiliates of Stifel Nicolaus. The only Stifel Nicolaus employees allowed to access your personal health information are those with a specific business-related need.

Reviewing Your Personal Health Information

If you own a life insurance or annuity product purchased through a Stifel Nicolaus Financial Advisor, you may write to request a summary of your data. You may also request copies of your files. This does not apply to information relating to disputes or legal proceedings between us. Stifel Nicolaus may charge you a reasonable fee to produce the information requested. You may also contact us if you believe any data about you in our files is incorrect or incomplete. Please write to:

Compliance Department
Stifel, Nicolaus & Company, Incorporated
One Financial Plaza
501 North Broadway
St. Louis, Missouri 63102