



Annual Notice of Innovo Benefits Administration's Privacy Practices and Policies as Required by the Gramm-Leach Bliley Act

PURPOSE OF THIS NOTICE

The privacy of personal information is important to Innovo Benefits Administration. Title V of the Gramm-Leach-Bliley Act (GLBA) is a United States law that generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about consumers or customers with a nonaffiliated third party unless the institution provides the appropriate consumer or customer with a notice of its privacy policies and practices, such as the type of information that it collects from customers and consumers and the categories of persons or entities to whom the information may be disclosed. In compliance with the GLBA and state laws relating to privacy in the insurance industry, and in order to notify our clients of our privacy practices, we are providing you with this document to inform you of our privacy policies and practices.

Innovo Benefits Administration provides insurance brokerage, benefits administration, and related services to its corporate, association and individual clients ("Clients").

1. Information we collect:

We collect nonpublic personal information about the employees and members of our corporate and association Clients, in certain cases their family members (collectively, "Participants") and our individual Clients from the following sources:

- Information we receive from Clients and Participants on applications or other forms or in connection with providing services to Clients and Participants.
- Information we receive as a result of processing and verifying the information provided to us about Clients and Participants.
- Information we receive from affiliates, insurers, other intermediaries, third party providers and others about our Clients and Participants.
- Information we receive from consumer reporting agencies.
- Information available from external sources (such as publicly available records).

2. Information we may disclose to third parties:

We do not disclose any nonpublic personal information about our Clients, former Clients, Participants or former Participants to any third parties, except as stated in this policy and as otherwise permitted by law. We may share this information outside the company in order to process or complete, or otherwise in connection with, the transaction for which the information was provided or as otherwise authorized by our Clients or Participants. The GLBA and this notice do not affect any rights an individual Client or Participant may have under the Fair Credit Reporting Act.

3. Our practices regarding information confidentiality and security:

We restrict access to nonpublic personal information about Clients and Participants to those employees of ours and our affiliates who need to know that information in order to provide products or services to our Clients and Participants. We have in place physical, electronic, and procedural safeguards in order to guard any nonpublic personal information we maintain regarding Clients and Participants.

You do not need to call or do anything as a result of this notice. It is meant to inform you of how we treat your nonpublic personal financial information.