

Windfall Insurance Services Respects Your Privacy

Protecting your privacy is very important to us. Policyholders like you have trusted us with their insurance needs for over 23 years, and we take our obligation to safeguard and secure your personal information very seriously. We want you to understand how we protect your privacy and when we collect and use your information.

Summary

This summary tells you the basics of our privacy commitment to you-how we collect and use your information, how we protect it, and who can see it. You should read the entire privacy policy below for full details.

- We obtain personal information from you directly, from your transactions with us, and from third parties
 - such as state motor vehicle departments.
- We will not sell your information to third parties.
- Any third parties who perform services for us are required to safeguard any customer information and may
 - only use it in connection with performing those services.
- We extensively secure and limit access to your information.
- We protect information about potential, current, and former policyholders.

The Information We Collect

Non-public personally identifiable information ("Information") is information that identifies you and is not available to the general public. The following sections tell you more about how and when we collect your Information.

Information We Obtain From You

During the quoting, application, or claims handling processes you may give us Information such as your:

- Name
- Address
- Phone number
- Email address
- Social Security number
- Driver's license number
- Date of birth

If you gave us your email address, WINS may use it from time to time to notify you of such things as new services, special offers, or to confirm transactions. If you do not wish to be contacted by email for non-policy related communications, you may unsubscribe by following the instructions at the bottom of any WINS email you receive.

Information about your transactions

We may collect Information about your transactions and experiences with us and others, such as your payment history, claims, coverage, and vehicle changes.

Information From Third Parties

We may receive Information about you from consumer reporting agencies, which provide us with motor vehicle reports, claim reports, and/or credit information where permitted by law. When you ask for a rate quotation, we may obtain credit information if permitted by applicable state law.

Our sales and service representatives do not have access to the details of your credit information. Other companies who view your credit report will not see the WINS inquiry. It will be visible only to you. Our inquiry will not affect your credit score or credit rating. If you

commit to purchase a policy with WINS, we will also confirm your motor vehicle record and claims history. As permitted by law, we may also review your motor vehicle record, claims history, and/or credit information in connection with any renewal.

The Information We Disclose

Information about our customers or former customers will only be disclosed as permitted or required by law. Information about you that has been collected is maintained in your policy and/or claims records.

We use this Information to process and service your policy; to settle claims; with your consent; or as directed by you. We may also disclose it to persons or organizations as necessary to perform transactions you request or authorize. Information about our former customers and about individuals who have obtained quotes from us is safeguarded to the same extent as Information about our current policyholders.

Following are some examples of how we may disclose Information:

We must exchange Information about you with our agents, investigators, appraisers, attorneys, and other persons who are or will become involved in processing your application and servicing your policy or any claims you may make.

When you are involved in a claim, policy information is provided to adjusters and the businesses that will repair your vehicle.

We may share Information with persons or organizations that we have determined need the Information to perform a business, professional, or insurance function for us. These include businesses that help us with administrative functions. If the law in your state permits, we may share Information with financial institutions with which we have a joint-marketing agreement. All of these entities are obligated to keep the Information that we provide to them confidential and to use the Information only for the purpose for which the Information was provided.

Information may be provided to organizations conducting actuarial research or audits. In this case, you will not be individually identified in any research report. The organization must agree not to redisclose the Information and the Information will be returned to us or destroyed when it is no longer needed.

We may also share your Information for other permitted purposes, including:

- With another insurance company if you are involved in an accident with their insured
- With our reinsurers
- With insurance-support organizations that detect and prevent fraud
- With medical professionals or institutions in order to verify coverage or conduct operations or services audits
- With state insurance departments or other governmental or law enforcement authorities if required by law or to protect our legal interests or in cases of suspected fraud or illegal activities
- If ordered by a subpoena, search warrant or other court order

Confidentiality and Security

We restrict access to your Information to employees who we have determined need it in order to provide products or services to you. We train our employees to safeguard customer information, and we require them to sign confidentiality and non-disclosure agreements. We maintain strict physical, electronic, and procedural safeguards to protect your Information from unauthorized access by third parties.

Your Security is Important

The Effective Date of the revised Privacy Policy is August 27, 2010.