

# **Privacy Policy**

#### We Respect Your Privacy

This Privacy Policy is being provided by the Western & Southern Financial Group, which includes the following member companies (collectively, "We", "Our" and "Us"):

- The Western and Southern Life Insurance Company
- Western-Southern Life Assurance Company
- Western & Southern Agency, Inc.
- W&S Brokerage Services, Inc.\*
- W&S Financial Group Distributors, Inc.
- W&S Wealth Solutions, Inc.
- Columbus Life Insurance Company
- Eagle Realty Group, LLC
- Eagle Realty Capital Partners, LLC\*\*
- Fort Washington Capital Partners, Inc.
- Fort Washington Investment Advisors, Inc.\*\*
- IFS Financial Services, Inc.
- Gerber Life Agency, LLC
- Integrity Life Insurance Company
- The Lafayette Life Insurance Company
- The Lafayette Life Insurance Agency, Inc.
- National Integrity Life Insurance Company
- Touchstone Advisors, Inc.\*\*
- Touchstone Securities. Inc.\*

## Our Pledge to Our Consumers

We place a high value on the confidence Our consumers place in Us. Today's technology allows information to be shared at light speed, and We share your concerns about privacy. You have Our pledge that We will treat your personal information with respect and confidentiality. Please take a moment to review Our Privacy Policy and see how it protects you. By visiting any of Our websites, you are accepting the practices described in this Privacy Policy.

- We collect only the information We need to serve you and conduct Our business with you.
- We are committed to keeping your information confidential, and We place strict limits and controls on the use and sharing of your information.
- We make every effort to ensure the accuracy of information.
- We train all of Our employees about the importance of protecting consumer information in regard to consumer respect, privacy, confidentiality, and security.
- All of Our full-time, part-time and temporary employees, including leased employees, consultants
  and contractors (and their respective employees or subcontractors) and licensed captive and
  independent insurance agents must adhere to all privacy and confidentiality policies.
- We practice and enforce procedural, physical, and electronic safeguards to protect consumer information.
- We only retain information as long as We have a business, legal or regulatory need.



- Third parties who need access to consumer information must have a privacy policy consistent with Our own. They may use the information only to provide the services We request of them, and may not use the information for any other purpose.
- We do not sell consumer information.

The business purpose(s) for collecting your information may include any of the following:

- Bank Account or Payment Information
- Data Analysis
- Health Benefits
- Expense Management
- Fund Management
- Insurance Products and Services (Actuarial Services, Underwriting)
- Payroll
- Real Estate Products and Services
- Legal or Regulatory Reporting
- Retirement Planning
- Sales and Marketing
- Investment Products and Services
- Talent Acquisition and Development
- Taxes

The categories of third parties with whom We may share or collect personal information for legal, regulatory or business purposes may include:

- · Agents and Producers
- · Benefit Service Providers
- Consulting Service Providers
- Data Processing and Software Service Providers
- Financial Institutions
- Government Entities
- Human Resource Service Providers
- Insurance Service Providers
- Investment Service Providers
- Marketing Service Providers
- Medical Information Providers
- Reinsurers

#### Information We Collect & Where We Collect It

We collect information which can include personal information. The material in this section pertains to your information that We may have collected. We may collect information in the following ways:

- Information collected on applications for products or other forms, whether on this website, by mail
  correspondence or phone, or in conversation with any of Our representatives. We collect this
  information to service your accounts, and to provide information to you about Our products and
  services:
- Information collected on applications for employment or selling agreements;
- Information We receive from consumer reporting agencies;



- Medical information that you provide or that is provided to Us. We may use this medical information
  for a product or service you're interested in, to pay a claim, or to provide a service. We may share this
  information for these purposes if required or permitted by law. We do not use it for marketing
  purposes unless you give Us permission;
- Financial information that you provide or that is provided to Us. We may use this information for a product or service that you are interested in, or to provide a service to you;
- Information We collect through the use of cookies. Please read Our Cookie Policy for more details. We do not use Web Beacons to monitor your activity on Our site;
- Third party marketing organizations; and
- Third party recruiting organizations.

Third parties and service providers may collect information about your online activities over time and across different websites, including when you visit Our website. These companies may place cookies on your computer. These third party cookies help Us provide relevant marketing to you when you visit, or based on your activity, on Our website or third party websites. Besides cookies, We may also use tracking pixels or other analytic mechanisms to track your usage patterns. For example, we may use software that records how long a user spends on a page, how the user moves or clicks through the website, and how the user interacts with forms. This information is collected by a third-party who provides us with an aggregated report, but we also can play back individual sessions on their site to see a customer's real experience. Another third party service We use is Google Analytics. To see how Google Analytics collects and processes data, please visit www.google.com/policies/privacy/partners/.

In some situations, third parties and Our service providers may not have your name, but information could be linked back or traced to you via specific device and browser settings, a device number, or other identifier. By interacting with our site, filling out a form, or using Our services, you consent to our collection and sharing of your personal information with third parties and service providers, as described in this policy. You can opt-out of sharing, or exercise other rights, as described below under "Your Rights Regarding Your Information."

The information We collect from the sources listed above may include:

- Name
- Alias
- Mailing address
- E-mail address
- Telephone number
- Birth date/Age
- Driver's license/State I.D.
- Passport number
- Gender (may include gender identity/ expression)
- Sexual orientation
- Race/Color
- Account name
- Social security number
- Assets
- Income
- Bank account information
- Other financial information
- Education information
- Occupation
- Marital status



- Military or veteran status
- Religion
- National origin
- Ancestry
- Citizenship or immigration status
- Joint owners
- Beneficiaries
- Contract/Policy number
- Biometric information
- Medical history/Condition/Health information
- Other medical information
- Health insurance information
- Disability (mental and physical including HIV/AIDS, cancer, and genetic characteristics)
- Professional or employment information
- IP address (the number assigned to your computer when you use the Internet)
- Geolocation data
- Your domain name
- Your browser and platform types
- The time you accessed Our site
- · Your activity while on Our site

# Our Disclosure Policy

We do not disclose any personal information about Our consumers or former consumers to anyone, except as permitted by law or as described in this Privacy Policy. We limit Our collection and use of personal information to provide you with services or administration of financial products by Us or third parties We retain for this purpose; to tell you about products and services; or to evaluate your financial needs. This may include advising you about products or services and other opportunities We believe you would find of interest. To do this, it may be necessary to share your information with Our licensed insurance agents or representatives of Our affiliates. We require that the companies to which We have disclosed information, including Our own affiliates and representatives, strictly maintain the confidentiality of this information and abide by all applicable laws, as well as adhere to a confidentiality agreement and/or Our Privacy Policy. While we do not sell your information, within the last 12 months, We may have disclosed any of the above listed information for business or marketing purposes to:

- Companies within our corporate family
- Third parties that perform marketing services on Our behalf
- Other financial institutions with which We have joint marketing agreements
- Third parties that you authorize Us to send your information
- Regulatory bodies
- Third parties with whom We have contractual vendor relationships

Access to your personal information is restricted to authorized employees who need the information to administer your business. We may disclose your personal information to perform necessary credit checks, to collect or report debts owed to Us, and to protect Our rights or property. At this time, We do not respond to browsers "do not track" signals or other mechanisms regarding the collection of personal information about your online activities over time and across different websites.

Sometimes it is necessary to also provide information about you to various companies such as transfer agents, custodians, broker-dealers, and marketing service firms to facilitate the servicing of your account. These organizations have a legitimate business need to see some of your personal information in order for Us to provide services to you. We may disclose to these various companies the information that We collect as described above. We require that these companies strictly maintain the confidentiality of this information and abide by all applicable laws. We do not permit these associated companies to sell the information for their own purposes, and We never sell Our consumer information.



# Artificial Intelligence and External Data Disclosure

The information below outlines the usage of Artificial Intelligence Systems (AIS) and External Consumer Data and Information Sources (ECDIS).

Use of Artificial Intelligence Systems (AIS) and External Consumer Data (ECDIS)

• We use AIS and ECDIS in a variety of ways, including in our underwriting and pricing processes, to improve the quality and efficiency of the products and services we provide to you.

## External Data Usage

We may obtain and use data about you from external vendors.

# Life Insurance Applicants

• In the case of life insurance, if a declination, limitation, rate differential, or any other adverse underwriting decision occurs, we will provide you with the reasons behind the decision. This will include an explanation of the AIS and ECDIS we used in making that decision.

#### For New York Residents

 As a resident of New York, you have the right to request specific information regarding the ECDIS or AIS data that influenced any underwriting or pricing decisions related to your policy or contract. Should you wish to make such a request, please contact us at 800-926-1993, and we will provide the relevant information.

#### **Our Communication Practices**

We take the security of your personal information very seriously. We provide security features to help ensure you can access your information. Our verification process provides an extra layer of information security designed to keep your information safe. When you initiate contact with Us, we will verify your identity or that of your authorized representative before sharing information. We will ask you or your representative to verify information We have on file or ask other questions to confirm that We are speaking to you or your authorized representative.

## Protecting Children's Privacy

We recognize the importance of protecting children's privacy. We do not sell consumer personal information, including information on minors under 16 years of age.

## **Designation of Authorized Representative**

You may provide Us (or Our designee) with a written authorization for an authorized representative to represent and act on your behalf and consent to a request of information related to you to the authorized representative.

# **Notification of Privacy Policy Changes**

This Privacy Policy was last updated on October 21, 2024. The Privacy Policy may be modified occasionally and We will post modifications on this website as We implement them. The date of the latest revision will appear at the bottom of this page and We encourage you to check periodically for updates.



## Your Rights Regarding Your Information

Subject to certain exemptions, you have certain rights regarding your information that We and Our affiliates collect.

- You have a right to access your personal information that is collected.
- You have a right to request that We delete your personal information, pursuant to applicable law.
- You have a right to correct inaccurate personal information.
- You have a right to request information about how your information is shared and what it is used for.
- You have a right to know what personal information is shared and with whom it is shared.
- You have a right to know with what third parties your information is shared.
- You have a right to opt out of the sharing of your personal information.
- You have a right to opt out of Our marketing to you.
- You have a right to receive a response within 45 days as of the date of the request.
- You have a right to file a statement if your request was refused.

To exercise any of these rights you can contact customer service or visit https://www.westernsouthern.com/privacy-request.

#### Non-Discrimination

We will not discriminate against you or any other individual for the exercise of privacy rights conferred under applicable law.

#### Opting Out of Information Sharing

When you fill out forms on this website, including promotional offers, sweepstakes, contests, or requests to be contacted, you are, by default, allowing a representative of Us to contact you using the information you provided as well as allowing Us to possibly disclose your information to the companies listed above. Contact may also be in response to customer service inquiries, to provide you with information or material you have requested or to provide you with marketing or promotional offers. Contact may include telephone solicitation and/or e-mail communications.

Federal and state laws give you the right to limit some but not all marketing from Us as well as the information We share. Federal and state laws also require Us to give you this notice to tell you about your choice to limit marketing from Us as well as the information We share. You may limit Us and Our own subsidiaries, such as Our insurance and securities affiliates, from marketing their products or services to you based on your personal information that they receive from Us or from sharing your information.

To limit the sharing of your information, contact Us at 866-590-1349.

# Privacy While Online

We employ safeguards to keep your information private and secure while you are online. Specific Internet practices include:

- Use of Secure Sockets Layer (SSL) technology to encrypt transmitted data.
- Maintaining firewall barriers and authentication procedures to prevent unauthorized access.
- Use of Cookies.
- Reviewing Our policies and practices to stay in accord with industry standards for privacy.
- Testing the strength of Our security in order to maintain a secure website.
- Monitoring Our computer networks.



# Accessibility Statement

Western & Southern will provide information in the Privacy Policy in an accessible format for those with a disability. To request this Privacy Policy in an accessible format please call Us at 877-367-9734 or email Us at http://www.westernsouthern.com/contact/send-us-an-email. Your request should include your name, phone number, and the mailing address where we should send the material. We may contact you for additional information.

#### **Affiliates**

Our affiliates include companies with the Western & Southern name; financial companies such as The Western and Southern Life Insurance Company, Western-Southern Life Assurance Company, Western & Southern Agency, Inc., W&S Brokerage Services, Inc., W&S Wealth Solutions, Inc., Columbus Life Insurance Company, The Lafayette Life Insurance Agency, Inc. Gerber Life Insurance Company, Gerber Life Agency, LLC, Integrity Life Insurance Company, National Integrity Life Insurance Company, W&S Financial Group Distributors, Inc., IFS Financial Services, Inc., Touchstone Securities, Inc., Touchstone Advisors, Inc., Fort Washington Investment Advisors, Inc., Eagle Realty Capital Partners, LLC, Eagle Realty Group, LLC and Fabric Technologies, Inc.

#### Questions

For questions regarding this Privacy Policy, call 800-926-1993.

<sup>\*\*</sup>registered investment advisor