

# ING's Privacy Promise

**The ING companies in the U.S. take your privacy very seriously. We share a commitment to protect your privacy and the confidentiality of your personal and financial information.**

As providers of products and services that involve compiling personal – and sometimes, sensitive – information, protecting the confidentiality of that information has been, and will continue to be, a top priority throughout the ING companies. We believe that you should know about the information we collect, the measures we take to safeguard it, and the situations in which we might share information with select business partners. This notice explains how the ING companies handle – and protect – the personal information we collect. “ING companies” or “ING company” refers to the ING businesses in the U.S. listed at the end of this notice.

The information we collect and the extent to which we use it will vary depending on the product or service involved. In fact, in certain cases, we may not collect or share some of the types of information noted below. For example, in a number of cases an ING company has an agreement with distributors or plan sponsors that limits the sharing of information about its customers with any other company, even if that company is an ING affiliate. These agreements continue to be honored.

Our privacy promise derives from basic principles of trust, ethics and integrity:

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**1. We collect only the customer information necessary to consistently deliver responsive products and services.**

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The ING companies collect information that helps serve your financial needs; provide high standards of customer service; develop and offer new products or services for our customers and potential customers; and fulfill legal and regulatory requirements. The information collected generally varies depending on the products or services you request and may include:

- Information provided on applications and related form – for example, name, address, Social Security number, and annual income.
- Responses from your employer, benefit plan sponsor, or association regarding any group products we may provide – for example, name, age, address, and Social Security number.
- Third-party reports, such as consumer credit history, motor vehicle records, demographic and/or medical information, if relevant to your product or service.
- Information about your relationships with us, such as products or services purchased, and account balances (if applicable), which we may obtain in writing, during telephone or Internet transactions or from data gathering software used when you are accessing ING Web sites.

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**2. We maintain safeguards to ensure information security.**

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We have implemented security standards and processes – including physical, electronic and procedural safeguards – to ensure that access to customer information is limited to employees, registered representatives or agents who may need it

to do their job. They are required to respect the confidentiality of all customer information.

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**3. We limit how, and with whom, we share customer information.**

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First and foremost, we do not sell lists of our customers, nor do we disclose customer information to marketing companies outside the ING companies, with the exception of companies we may hire to provide specific services for us, as described below.

**Under no circumstances do we share medical information for marketing purposes.**

We will share customer information only for the following reasons:

When you have requested a life insurance product, the ING life insurance companies may use a common application to avoid multiple medical tests; in this way, the information you provide and authorize us to obtain may subsequently be used by one or all of these companies as necessary to determine – and offer to you – the product most appropriate for your needs.

We may be required by law or regulation to disclose information to third parties – for example, in response to a subpoena, to prevent fraud, and to comply with rules of, or inquiries from, industry regulators.

In some cases, we may share information we collect — for example, name, address, age, and Social Security number – with other ING businesses such as our securities broker-dealers, our insurance



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companies and agencies, or our banks to process or service a transaction you have requested, to facilitate enhanced customer services, or to inform you of ING products or services you may find useful. In a few cases, an ING business not listed in this notice may have a privacy policy that differs from the one stated in this notice. If that is the case, you will receive a separate privacy notice from that ING business if you are a customer. The agent or registered representative with whom you work to obtain ING financial products and services may use the personal information about you in his or her own files to advise you of other products or to help you with your overall financial strategy.

Except for reinsurance transactions with an affiliated company, an ING company will not share information about you with another ING company that may be used to make insurance underwriting or lending decisions about you, unless you direct us to or unless we tell you first and give you a chance to say no.

Furthermore, as permitted by federal and state laws, we may share or exchange information with companies engaged to work with us, such as:

- Third-party administrators and vendors hired to effect, administer or enforce a transaction that you request or authorize; to develop or maintain software; or to perform marketing research.
- Financial services entities, such as banks, credit unions, credit union service corporations, insurance companies, or securities broker-dealers, with which we have joint marketing agreements; and vendors who provide us with demographic information to develop marketing plans. The information we may share is described in section 1.
- Reputable consumer reporting agencies in connection with your application or renewal of insurance coverage.

Other than what is described previously, we won't share information about you with third parties to market products to you, unless we tell you about it first, and give you a chance to say no.

We uphold these privacy principles throughout the ING companies and with our business partners. Companies with which we share customer information are required to maintain the confidentiality of that information.

We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with any of the ING companies. While this policy may change from time to time, you can always review our current policy online at [www.ing-usa.com](http://www.ing-usa.com).

In this notice of our Privacy Promise, the words "you" and "customer" are used to mean any individual who obtains or has obtained a financial product or service from an ING company that is to be used primarily for personal, family or household purposes.

### Following is a list of the ING companies that this notice applies to, as of May 1, 2002:

Aeltus Investment Management, Inc.  
Aeltus Trust Company  
Ameribest Life Insurance Company  
Branson Insurance Agency, Inc.  
Directed Services, Inc.  
Equitable Life Insurance Company of Iowa  
Golden American Life Insurance Company  
ING America Equities, Inc.  
ING America Insurance Holdings, Inc.  
ING Capital Corporation, LLC  
ING Financial Advisers, LLC

ING Funds Distributor, Inc.  
ING Funds Services Company LLC  
ING Insurance Company of America  
ING Investments, LLC  
ING Life Insurance and Annuity Company  
ING National Trust  
ING Re Underwriters, Inc.  
Life Insurance Company of Georgia  
Midwestern United Life Insurance Company  
Northern Life Insurance Company  
ReliaStar Financial Corp.

ReliaStar Life Insurance Company  
ReliaStar Life Insurance Company of New York  
Security-Connecticut Life Insurance Company  
Security Life Assignment Corporation  
Security Life of Denver Insurance Company  
Southland Life Insurance Company  
Systematized Benefits Administrators, Inc.  
United Life & Annuity Insurance Company  
United Variable Services, Inc.  
USG Annuity & Life Company