

HUB INTERNATIONAL CONSUMER PRIVACY POLICY AND PRACTICES

Effective date February 7, 2012 (last updated February 7, 2012)

FACTS

WHAT DOES HUB INTERNATIONAL LIMITED (“HUB”) DO WITH YOUR PERSONAL INFORMATION?

Why?	<p>Financial companies choose how they share your personal information. Federal law gives consumers and clients the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.</p>
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> your name, address and social security number. your payment history and claims information. passive tracking information from our website or the Internet, including information obtained through the use of Internet “cookies.” information from other reporting agencies and state and federal government agencies, such as state motor vehicle departments. information from other sources, such as your employer, information clearinghouses, medical or health care providers and/or other third parties. your health, medical conditions or treatment. your log-in information when you log into our website. <p>When you are no longer our customer, we continue to share your information as described in this policy.</p> <p>If you use our website, we may collect information about the browser you are using. Our web server may store your IP address and domain. We might track the pages you visit. We might look at what site you came from, or what site you visit when you leave us. We collect this information using tracking tools described in this policy.</p>
How?	<p>All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons HUB chooses to share; and whether you can limit this sharing.</p>

Reasons we can share your personal information	Does Hub share?	Can you limit this sharing?
For our everyday business purposes –	Yes	No

<p>such as to maintain your account(s), report to credit bureaus, to process or service requested or authorized transactions, to secure quotations for insurance, to obtain insurance coverage or to report or process claims.</p> <p>We may also disclose your health, medical conditions or treatment information as necessary to process or service requested or authorized transactions or as otherwise permitted or required by law.</p>		
<p>In order to comply with the law – to respond to court orders, legal investigations or subpoenas.</p> <p>We may also share if a government agency requests. We may also share if an investigatory body requests. We may also disclose your information as required by the Fair Credit Reporting Act.</p>	Yes	No
<p>For our marketing purposes – to offer our products and services to you.</p>	Yes	No
<p>For joint marketing with other financial companies</p>	Yes	No
<p>For our affiliates’ everyday business purposes – information about your transactions and experiences, to process or service requested or authorized transactions, such as to secure quotations for insurance, obtain insurance coverage or to report or process claims.</p>	Yes	No
<p>For our affiliates’ everyday business practices – information about your creditworthiness.</p>	Yes	Yes
<p>For our affiliates to market to you</p>	Yes	Yes
<p>For nonaffiliates to market to you</p>	Yes	Yes

<h2 style="margin: 0;">To Limit Our Sharing</h2>	<p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. You can, however, contact us at any time to limit our sharing.</p> <p>You can opt out of receiving marketing emails by following the instructions in any marketing emails or text messages you receive. You can also opt-out by sending us an email at InformationCompliance@hubinternational.com or completing our on-line client opt-out form that can be found at the end of this policy. To request changes to or to review your information, or to have your personal information deleted, please send us an email at InformationCompliance@hubinternational.com. You may also write to our Chief Legal Officer at the address shown at the bottom of this policy.</p> <p>If you do not wish to allow our website to use cookies, you may configure your browser to block them. Please understand that blocking cookies may reduce the functions and services our website makes available to you. Please</p>
--	--

	<p>refer to the specific instructions for your browser if you would like to block or screen cookies.</p> <p>You can choose not to provide personal information while on our website; however, if you do not provide us with information, some website features may not work. You can also choose to configure browser not to accept cookies. If you do so, however, some parts of our website may not work.</p>
--	---

Questions?	Call 877.402.6601 or go to www.hubinternational.com .
-------------------	---

Who we are	
Who is providing this notice?	<p>This notice is provided by Hub and its subsidiaries and operating divisions listed below:</p> <ul style="list-style-type: none"> • Hub International Financial Services • Hub International Group Northeast Inc. • Hub International Gulf South • Hub International Insurance Services Inc. • Hub International Midwest Limited • Hub International Mountain States Limited • Hub International New England, LLC • Hub International Northeast Limited • Hub International Northwest LLC • Hub International Southeast • Hub International Southwest • Hub International Texas, Inc. • Hub International Transportation Insurance Services Inc. • Hub International West Holdings Limited • Burnham Stewart Reinsurance, Ltd. • Claims Administration Corporation • Flynn Insurance Agency • Impact Select Group, Inc. • Knauff Insurance Agency, Inc. • Obenchain Insurance, Inc. • Program Brokerage Corporation • Rigg Insurance Managers, Inc. • Sander A. Kessler & Associates, Inc. • The Feitelberg Company of Rhode Island, LLC • Voluntary Benefits Services Inc. • Wm. Rigg Co. <p>This listing is provided and is current as of May 4, 2012</p>

What we do	
How does HUB	To protect your personal information from unauthorized access and use, we

What we do	
protect my personal information?	<p>use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We restrict access to such information to those employees or service providers who need to know such information in order to provide the requested services or products.</p> <p>For those who access our website, the Internet is not 100% secure and we cannot promise that your use of our website will be completely safe. We encourage you to use caution while on the Internet.</p>
How does HUB collect my personal information?	<p>We collect your personal information, for example:</p> <ul style="list-style-type: none"> • When you submit an application or other completed forms that we receive from you. • Through your transactions with us, our affiliates or other third parties. • On our website or the Internet, including information obtained through the use of Internet “cookies.” • From consumer or other reporting agencies and state and federal government agencies, such as state motor vehicle departments. • From other sources, such as your employer, information clearinghouses, medical or health care providers and/or other third parties. • Through co-branded areas on our website, which may use passive tracking to recognize you as a customer. This cookie will restrict your ability to access other insurance brokers or other businesses that would otherwise be made available to you on the co-branded areas. <p>We also collect your personal information from others, such as credit bureaus, affiliates or other companies.</p>
How does HUB use my information?	<ul style="list-style-type: none"> • To respond to your questions and requests. • To improve our website and update our email lists. For example, we might use cookies or your IP address to track new or past website visitors. We may also use tracking tools to see what areas of our website are the most interesting to our visitors. • To communicate with you about our relationship. • For other business purposes. For example, we may use your email address to inform you about our products or services.
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness. • Affiliates from using your information to market to you.

What we do	
	<ul style="list-style-type: none"> • Sharing for nonaffiliates to market to you. <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What if there is more than one insured on a policy?	This policy describes our privacy practices for both current and former customers. If there is more than one person insured under a policy, this policy will be sent only to the named insured on that policy, but applies to all insureds.
What if I access your website from outside the United States?	If you are located outside of the United States, please be aware that information you provide to us may be sent to the United States. By using our website and giving us your information, you agree to such transfer. You also understand that the U.S. may not provide the same level of protections as the laws of your country.

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Affiliates include the family of insurance brokerage and other financial services companies owned by HUB.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Our joint marketing partners include categories of companies such as insurance companies or banks.

Other important information	
<p>Our website contains links to third party sites. If you click on one of those links, you will be taken to websites we do not control. This policy does not apply to the information practices of those sites. You should read the privacy policy of those other websites carefully. We are not responsible for those third party sites. Links to outside sites do not constitute or imply endorsement by us of the linked site or any material displayed on those sites.</p>	
<p>The websites on which this policy appears are not intended for children under 13; however, if you are a parent or legal guardian and believe that your child under 13 has provided us with personally identifiable information, please email us at InformationCompliance@hubinternational.com. If you want to write, use the address shown at the bottom of this policy. Please mark your inquiries to the attention of “COPPA - Information Request” and include your email address and phone number.</p>	

Other important information

Learn more about how to protect your child online. Read the [helpful information provided by the FTC](#). This information includes this [consumer education bulletin](#).

From time to time we may change our privacy practices. The latest version of this policy will be posted on our website at the page it has historically appeared. Sometimes there may be a material change to this policy that we wish to apply retroactively. If so, we will notify you and obtain your consent to the extent required by law.

If you have additional questions you can call us at 877.402.6601, fax us at 866.296.8248, or reach us by email at InformationCompliance@hubinternational.com. You can write to us at:

Chief Legal Officer
Hub International Limited
55 East Jackson Boulevard, Floor 14A
Chicago, IL 60604

Please include your name, address, telephone number and email address whenever you contact us, including by email. This helps us handle your request correctly.

Please [click here](#) for an electronic version of our on-line client opt-out form.