

MUTUAL TRUST LIFE INSURANCE COMPANY, A PAN-AMERICAN LIFE INSURANCE
GROUP STOCK COMPANY

PRIVACY POLICY

PURPOSE.

The purpose of this Policy is to establish standards for protecting the privacy and confidentiality of information provided by our employees, customers and third parties. In addition, it our intent to define and document the ways we safeguard and balance privacy rights with our legitimate business needs to collect, maintain and communicate information. Finally, we are committed to complying with the applicable laws and regulations that protect private and confidential information in the jurisdictions in which we do business.

DEFINITIONS

“Confidential Company Information” encompasses, among other things, any non-public information concerning Mutual Trust, including its businesses, financial performance, results or prospects, and any non-public information.

“Confidential Customer Information” or “Third Party Information” includes any information relating to a specific Customer or Third Party such as name, address, phone numbers, financial information, credit card information and/or any other sensitive information provided by a Third Party or Customer with the expectation that the information be treated as confidential and used solely for the business purpose for which it was conveyed.

“Global Compliance and Ethics Committee” is a group of representatives of key areas of the Pan-American Life Insurance Group who discuss and advice on the establishment and achievement of the corporate compliance objectives.

“Customers” include policyholders, insureds and other related parties.

“ISPP Committee” is a group of representatives of key areas within Mutual Trust Life Insurance Company who discuss, review, create, monitor and advise on Information Security corporate compliance objectives.

“Mutual Trust” or “We” or “Our” or “Company” refers to Mutual Trust Life Insurance Company, a Pan-American Life Insurance Group Stock Company, each of its branches, subsidiaries, and affiliates.

“Third Party” includes a natural or legal person, other than Customers, with which we do business.

Accountability

Mutual Trust’s Privacy Officer, in conjunction with the Global Compliance and Ethics Department (Global Compliance) of Pan-American Life Insurance Group, is responsible for implementing corporate privacy policies and procedures along with providing training and guidance to ensure compliance with applicable laws and regulations. Mutual Trust’s ISPP Committee is responsible for policies and oversight of Information Security issues.

Mutual Trust employees are responsible for the privacy protection and are expected to:

- Become familiar and comply with privacy and data security policies and procedures;
- Complete the privacy training made available to them; and,
- Collaborate, as required, to implement this Policy and any related privacy awareness initiatives.

Transparency and Control

When collecting Confidential Customer Information or Third Party Information, the appropriate privacy notices must be disclosed as required by the applicable laws and regulations.

Independent Producers that market our products are required to comply with this Policy, our Third Part Code of Conduct and/or all applicable laws and regulations. When selecting a Third Party Vendor to process our Confidential Customer Information or Third Party Information, the Company will ensure that the vendor is able to meet applicable privacy and data security standards. In addition, there should be privacy and data security contractual guarantees made by every Third Party Vendor that receives Confidential Customer Information or Third Party Information which is approved by Mutual Trust's Legal Department.

Access

Mutual Trust takes steps to maintain the privacy and confidentiality of the information received from its Customers and Third Parties. Such information should not be accessed or used for anything other than business reasons. Confidential Customer Information and/or Third Party Information should not be disclosed without written authorization unless legally required (as determined by the appropriate Legal Counsel).

Security

Employees should take steps to adopt recommended data security best practices, such as encryption, and to transmit Confidential Customer and/or Third Party Information only through Mutual Trust-approved secure channels. Mutual Trust's ISPP Committee makes its best efforts to maintain and implement a data security program that includes industry standard administrative, technical, physical and operation safeguards designed to:

- Maintain security and privacy of Confidential Customer and Third Party Information;
- Protect against any anticipated threats or hazards to the security, privacy and integrity of Confidential Customer Information and Third Party Information; and
- Prevent unauthorized access, disclosure, alteration or destruction of private and confidential information that could result in harm to Mutual Trust, its employees, clients or third parties.

The nature and extent of protection will correspond to applicable local laws and regulations.

Policy Application and Training

Employees are responsible for reviewing and maintaining ongoing compliance with this Policy as well as other related privacy policies. Appropriate training on the various aspects of this Policy will be provided

to employees based on priority and relevance. Training will also be provided to new employees upon commencement of employment.

Enforcement

Compliance with this Policy is mandatory for all employees. Mutual Trust will take steps to implement protocols to verify ongoing compliance with this Policy and to enforce penalties against those who violate it. Privacy violations may be reported by contacting the appropriate manager, compliance officer, or the ISPP Committee at ISPP@mutual trust. Data security breaches or incidents should be immediately reported to the ISPP Committee or contact the Help Desk at (630) 684-5504.

Disciplinary Action

Appropriate disciplinary action will be taken against employees found to be in violation of this Policy, up to and including termination. Failure to report known violations of this Policy is considered a violation of the Code of Conduct.

RELATED DOCUMENT (S)

- Personal Information Protection Policy
- Data Breach Response Policy
- Incident Response Policy
- Clean Desk Policy
- Code of Conduct Policy
- Third-Party Code of Conduct