

## NORTHWESTERN MUTUAL'S

# COMMITMENT TO PRIVACY

At Northwestern Mutual, your privacy is important to us. We want you to know that:

- We do not sell or rent to anyone the information you have entrusted to us;
- We do not share your personal information with nonaffiliated companies that want to market their products or services to you (except at your request or with your consent);
- We do not offer an opportunity for you to prevent or "opt-out of" information sharing since we only share personal information with others as allowed by law. For policies attaching the Accelerated Care Benefit ("HIPAA covered policies"), we do not share your personal information related to the Accelerated Care Benefit with nonaffiliated or affiliated companies that want to market their products and services to you; and
- You do not need to contact us to benefit from our privacy protections.

To help you understand how we protect your personal information, this notice describes our current privacy policy and practices. We will advise you of our privacy policy and practices as required by law.

## OUR SECURITY STANDARDS

We have high security standards to keep the information we have about you safe. We maintain strict control over access to your information. The only employees who are permitted to access your information are those with a business need to know. Our standards to safeguard this type of information meet or exceed the requirements of federal and state law.

## INFORMATION WE MAY COLLECT AND USE

So that we can provide our products and services to you, we must collect personal information. The type of information we collect depends on the products and services you are interested in and whether you are the proposed insured. For example, we may collect identifying information such as your name, address and telephone number.

And we may collect other information such as your health, financial and employment history. We also may collect information to confirm your identity.

We may gather information about you from sources such as:

- Applications or claim forms, and required medical exams or tests;
- Written, electronic, telephone and other communications from you;
- Medical professionals, consumer reporting agencies and other companies with whom you do business;
- The client website outside accounts and/or document sharing features; and
- Your transactions with us and others, such as policy, payment and claim information.

We collect most information at the time of application or claim. However, we may need more information if you request a change to your contract or other service.

In some cases, we may use an insurance support organization or an investigative consumer agency to collect information that we need and submit a report to us. That organization may retain a copy of its report, and may disclose its contents to others for whom it performs such services. Such disclosures are made only as permitted by law and with appropriate authorization from you.

For HIPAA covered policies, our separate Notice of Privacy Practices describes how we collect, use and share your protected health information. If you would like a copy of this notice, please contact our privacy official at The Northwestern Mutual Life Insurance Company, 720 E. Wisconsin Ave., Milwaukee, WI 53202, 414-665-6042.

## INFORMATION WE MAY DISCLOSE

Northwestern Mutual regards all your personal information as confidential. However, in the course of conducting our business there are circumstances in which we may disclose to other parties information we have about you. As permitted by law, we may disclose information to the following parties without your authorization:

- Our reinsurers
- Persons or firms that perform business, professional or insurance functions for us;
- An insurance company or agent, insurance support organization or other insurance institution to enable us, our agents or other companies to which you may have applied to act on your application for insurance, reinstatement of policies or change in insurance benefits, or to perform other insurance functions or services, or for the purpose of detecting criminal activity, fraud or material misrepresentation and nondisclosure;
- Your attending physician or medical professional or facility to enable them to inform you of medical information of which you may not be aware;
- Organizations conducting actuarial or other scientific research studies, audits or evaluations, in de-identified format;
- The Medical Information Bureau, Inc.;
- Insurance and other regulatory authorities;
- Law enforcement agencies to help prevent or prosecute fraud, or to alert them that unlawful activity may have occurred;
- For public health activities, such as the required reporting of disease, injury, birth and death, and for required public health investigations;
- If we believe you to be a victim of abuse, neglect or domestic violence, as required by law;
- To a government oversight agency conducting audits, investigations, or civil or criminal proceedings if required by law;
- If required to do so by a court or administrative subpoena or discovery request – in most cases, you will have notice of such release;
- To law enforcement as required by law to report wounds, injuries and crimes;
- If you are a member of the military, as required by armed forces services;
- If necessary for national security or intelligence activities;

- To worker's compensation agencies if necessary for your worker's compensation benefit determination;
- Others as permitted or required by law.

In addition, your Northwestern Mutual financial representative,\* and others assisting your financial representative, have access to the personal information needed to administer your business and provide service to you. As permitted by law, they may also use this information to advise you of additional financial products and services offered by the Northwestern Mutual family of companies.

Periodically, we may work with outside firms to help us develop our financial products and services and our marketing approaches. As permitted by law, we may share with such firms certain identifying and non-medical transaction information, as described above. We may also share this type of information within the Northwestern Mutual family of companies as permitted by law to better meet your needs and advise you of the full array of other financial products and services we have to offer, such as insurance, securities, trust services and estate planning.

While it is sometimes necessary for us to hire other parties to help us conduct our business, please be assured that we expect them to maintain the confidentiality of your personal information and abide by all applicable privacy laws. Further, we do not authorize them to use or disclose your personal information for any purpose other than the work they are doing on our behalf or as required by law.

Should your relationship with Northwestern Mutual end, we will continue to limit disclosures of your personal information in accordance with our stated privacy policy and practices just as we do for those with a continuing relationship with us.

## REVIEW AND CORRECTION OF INFORMATION

For All Information:

We want to make sure that we have accurate information about you. Generally, upon written request, you may learn the nature and substance of personal information about you recorded in our files, see or obtain a copy of that information, and learn the identity of those to whom we have disclosed the information in the last two years (three years with respect to disclosures of medical information). If the information was received from an institutional source, we will identify it. Information developed through MIB, Inc. and any investigative consumer report, which is regulated by the Fair Credit Reporting Act, will be disclosed in accordance with the procedures outlined in the Medical Information Bureau or Fair Credit Reporting Act notices provided with your application. Information we have collected in connection with or in anticipation of a claim or legal proceeding will not be made available. We have the right to disclose specific items of medical record information, supplied by a medical care facility or medical professional, only to a licensed medical professional designated by you so that it may be properly explained. We may charge you for copies of records you request.

If you believe that any of our records are inaccurate, you may notify us in writing of any corrections, amendments or deletions that you believe should be made, and we will review the information. Within thirty (30) business days from the date we receive your request, we will correct,

amend or delete the disputed information, or we will notify you that we are refusing your request and give you reasons for the refusal. If we do not accept your requested modifications, you can file a statement of disagreement and your reasons, which will become part of our file. If we alter your record on your request or if you file a statement of disagreement, that information will be called to the attention of anyone having access to the information in the future, or, if appropriate, who has previously had access.

For Accelerated Care Benefit Information:

You have the right to copy and/or inspect personal information about you in certain records that we retain on your behalf, including your application, billing and benefit statements, claim forms, policy change requests, and records relating to your health or medical condition or treatment. We may charge you a reasonable, cost-based fee for any copies you request. We may also charge for postage if you request a mailed copy, and will charge for preparing a summary of the requested information. Information we have collected in connection with or in anticipation of a legal proceeding will not be made available.

Should you request an amendment to your information, please understand that we will not amend personal information about you that we did not create unless we are notified of the need for amendment by the entity that created it. For example, requests to amend information in your medical records need to be directed to the medical provider or facility that created the information.

You also have the right to learn the identity of those to whom we have disclosed the information in the last six years. The first report in any 12-month period is free of charge; you may be charged a reasonable, cost-based fee for each subsequent report you request within the same 12-month period.

If you wish to have further information regarding our information processing practices, or if we can be of help in obtaining or correcting information or providing other assistance to you, please write to:

Vice President of New Business  
The Northwestern Mutual Life Insurance Company  
720 E. Wisconsin Avenue  
Milwaukee, Wisconsin 53202

This notice applies to The Northwestern Mutual Life Insurance Company and its financial representatives. The notice also applies to Northwestern Mutual Investment Services, LLC, which is a registered broker-dealer, and Northwestern Mutual Series Fund, Inc., which is a registered investment company, with respect to their activities of making available the variable contracts of Northwestern Mutual, and this notice applies to the following separate accounts of The Northwestern Mutual Life Insurance Company: Northwestern Mutual Variable Life Account, Northwestern Mutual Variable Life Account II, NML Variable Annuity Account A, NML Variable Annuity Account B, and NML Variable Annuity Account C. If you have a relationship with additional Northwestern Mutual affiliated companies, you may receive privacy notices from them.

\* Northwestern Mutual financial representatives are individuals authorized to sell for The Northwestern Mutual Life Insurance Company.

Direct inquiries to:  
Privacy Notice – Northwestern Mutual,  
720 E. Wisconsin Avenue, Milwaukee, WI 53202

Northwestern Mutual is the marketing name for The Northwestern Mutual Life Insurance Company (NM), Milwaukee, WI (life and disability insurance, annuities, and life insurance with long-term care benefits) and its subsidiaries.