

ATLANTIC RISK MANAGEMENT, INC.
PRIVACY POLICY

as of March 4th, 2011

I. Introduction:

As a new or current customer of Atlantic Risk Management, Inc. ("ARM"), we would like to take this opportunity to both thank you for your business and to share with you the importance our agency places upon protecting the privacy of information we gather from you in accordance with applicable state and federal laws.

ARM is a member of the financial services industry and, as such, our agency has been and continues to be subject to federal and state privacy laws regarding the collection and exchange of your information. The following is ARM's privacy policy regarding the customer information we collect. Contained in this privacy policy you will find (1) an explanation of the types of information ARM collects from our clients and the means used to collect such information, (2) an explanation of how ARM shares the information collected from our clients, and (3) an explanation of how ARM protects client information.

II. Information we collect and the means to collect

ARM collects information about our customers that is necessary to provide those services usual and customary to independent insurance agents. ARM collects this necessary information from the following sources:

- ! Information we receive from you on applications or other insurance related forms, this information may include, but is not limited to, your name, tax identification number and date of birth.
- ! Information about our clients' transactions with us, this information may include, but is not limited to, claims and payment history.
- ! Information we receive from a consumer-reporting agency, this information may include, but is not limited to, a driving record or insurance score report.

To collect customer information from the above-stated sources, ARM may use the following means of communication to gather information: written, in-person, telephone, facsimile, electronically and online.

III. How we share client information with non-affiliated third parties:

We don't share information about our customers, or former customers with non-affiliated third parties other than as permitted or required by law. For example, ARM may share all of the information listed above with non-affiliated third parties for, including but not limited to, the following reasons:

- ! Information that is necessary to service or process the insurance needs of our clients, in a manner that is consistent with the usual and customer services provided by independent insurance agents. Such usual and customary services or processes provided by ARM to its customers include but are not limited to underwriting, shopping the renewal, rating, placement, and providing quotes for insurance that is germane to the coverage the customer places with our agency.
- ! Information that is necessary to protect the confidentiality or security of our client's records.
- ! Information that is necessary to resolve client disputes or inquiries.
- ! Information that is required by individuals or entities who are assessing our legal compliance.
- ! Information that is required for ARM to comply with the law.
- ! To an actuarial or research organization for the purpose of conducting actuarial or research studies.
- ! Information that is necessary to protect against or prevent fraud, unauthorized transactions, claims, or other liability.

IV. How we share client information with affiliated parties:

We share client information with any affiliate.

V. Our practices regarding information confidentiality and security:

We maintain physical, electronic, and procedural safeguards to guard your information. These safeguards include but are not limited to the following:

- ! We restrict access to nonpublic personal information about our clients and former clients to those employees who need to know that information in order to assist in providing services or products to the customer.
- ! We will punish any employees who impermissibly share client information.
- ! We use a secure Internet and e-mail provider to protect the confidentiality of electronic communications.

ARM appreciates your business and in order to continue building upon that relationship we believe it is necessary, not only from a legal standpoint, but also as a sound business practice that our customers understand the care our agency uses in handling your information. ARM will continue to monitor the effectiveness of this privacy policy.