

A Declaration of Client Privacy Rights – Putting the Client First

- As professional insurance brokers, we at Dowling Insurance Brokers will continue to hold our client's personal information in strict confidence, and we shall not disclose any such information unless authorized by our clients, required by law to do so or required to do so in conducting negotiations with underwriters or insurers on behalf of the client. Our Privacy Code builds on this commitment.

Principle #1 Dowling Insurance Brokers is Accountable

Dowling Insurance Brokers is accountable for all personal information in its possession or custody, including any personal information disclosed to third parties for processing or other administrative functions. Dowling Insurance Brokers has established policies and procedures to comply with this declaration, and has designated a privacy officer to be accountable for compliance.

Principle #2 Dowling Insurance Brokers will Identify Purposes

Dowling Insurance Brokers will identify the purposes for which it collects personal information, before or when the information is collected.

Principle #3 Dowling Insurance Brokers will Get The Clients Consent

Dowling Insurance Brokers will make a reasonable effort to make sure customers understand how their personal information will be used by the brokerage and insurers. Dowling Insurance Brokers will obtain consent from its customers before or when it collects or uses the personal information.

A customer's consent can be expressed, implied, or given through an authorized representative. A customer can withdraw consent at any time, with certain exceptions.

Principle #4 Dowling Insurance Brokers Limits The Collection of Personal Information

Dowling Insurance Brokers limits the amount and type of personal information it collects. Each broker will collect personal information for the purposes identified to the customer. Dowling Insurance Brokers collects personal information using policies and procedures which are fair and lawful.

Principle #5 Dowling Insurance Brokers Limits the Use, Disclosure and Retention of Personal Information

Dowling Insurance Brokers will use or disclose personal information only for the reasons it was collected, unless a customer gives consent to use or disclose it for another reason, or it is permitted or required by law.

Under certain exceptional circumstances, Dowling Insurance Brokers may have a legal duty or right to disclose personal information without the customer's knowledge or consent to protect the interests of insurers or the public interest.

Dowling Insurance Brokers will keep personal information only as long as necessary for the identified purposes for which it was collected.

Principle #6 Dowling Insurance Brokers will Keep Personal Information Accurate

Dowling Insurance Brokers will keep personal information as accurate, complete and current as necessary for the identified purposes for which it was collected.

Customers may, in writing, challenge the accuracy and completeness of their personal information and request that it be amended as appropriate.

Principle #7 Dowling Insurance Brokers Safeguards Client Information

Dowling Insurance Brokers protects personal information with safeguards appropriate to the sensitivity of the information.

Principle #8 Dowling Insurance Brokers makes its Information Policies Available to its Clients

Dowling Insurance Brokers is open about the policies and procedures it uses to manage personal information. Customers have access to information about these policies and procedures. This information will be made available in a manner that is generally easy to understand.

Principle #9 Dowling Insurance Brokers makes Personal Information Accessible

When customers make a request in writing, Dowling Insurance Brokers will within a reasonable time tell them what personal information it has, what it is being used for, and to whom it has been disclosed.

When customers request it in writing, Dowling Insurance Brokers will give them access to their personal information. Dowling Insurance Brokers will respond to the written request in a timely fashion. In certain situations, however, Dowling Insurance Brokers may not be able to give customers access to all their personal information. Dowling Insurance Brokers will explain the reasons for this lack of access and any recourse the customer may have, except where prohibited by law.

Principle #10 Dowling Insurance Brokers is Committed to Addressing Client Complaints and Concerns

Customers may challenge Dowling Insurance Brokers' compliance with this declaration. Dowling Insurance Brokers has policies and procedures to receive, investigate, and respond to customers' complaints and questions. Customers may learn about these policies and procedures by contacting Keith A. Phillips, the brokerage privacy officer, at 949-2600.