

INFINEX FINANCIAL GROUP

Notice of Privacy Policies

Protecting the privacy of our customers personal financial information is extremely important to the Infinex Financial Group family of companies (Infinex). We know that our customers provide confidential information to us in the course of our business, and we are committed to treating that information responsibly. This Notice outlines our practices regarding the collection and use of our customers nonpublic personal information. This Notice is given on behalf of the following Infinex companies: Infinex Investments, Inc. and Infinex Insurance Agency of Massachusetts, Inc.

I. Information We May Collect

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications and other forms
- Information about your transactions with us, our affiliates, or others; and
- Information we receive from a consumer reporting agency.

II. Information We May Disclose

We may from time to time disclose some or all of the information we collect (as described above) to our affiliates or nonaffiliated third parties.

III. Disclosures to Affiliates and Third Parties

We may disclose nonpublic personal information to members of the Infinex family of companies (affiliates) and others (third parties) as follows:

- A. We may from time to time disclose some or all of the nonpublic personal information we collect (as described above) to companies that perform services on our behalf, including marketing services, or to other financial institutions with which we have joint marketing agreements.
- B. We may disclose some or all of the nonpublic personal information we collect as permitted by law, such as to credit reporting companies or servicing or processing companies, or in response to a subpoena.
- C. We may disclose some or all of the nonpublic personal information we collect to the following types of affiliates and third parties:
 - Financial service providers, such as banks, securities broker-dealers and insurance agents and companies.

IV. Our Security Procedures

We have policies in place that are designed to limit access to nonpublic personal information to those employees who need to access that information in order to conduct our business operations or to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

V. Additional Information

We reserve the right to change this Notice, and to apply changes to information previously collected, as permitted by law. This Notice is merely a summary of select aspects of our privacy policies and procedures and does not constitute a contract.

If you cease to be our customer (for example, your account is closed or becomes inactive), our practices as described in this Notice, as changed from time to time, will continue to apply.