STERLING LIFE INSURANCE COMPANY
PRIVACY POLICY NOTICE
As of November 1, 2002

OUR PRIVACY POLICIES AND PRACTICES

Sterling Life Insurance Company ("Sterling") is committed to the highest level of integrity in all our dealings with our clients. This commitment extends to any personal information about you that we might possess or acquire. At Sterling, we are dedicated to providing you with the highest quality of service, support and products while taking appropriate actions and safeguards to protect your personal information.

PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing non-public personal information about you with a non-affiliated third party unless the institution provides you with a notice of its privacy policies and practices, including the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with GLBA, we are providing you with this document, which notifies you of the privacy policies and practices of Sterling.

GLBA further requires that we inform you that we must obtain your authorization to disclose your non-public personal information with a non-affiliated third party for any purpose that is not specifically authorized by law. Your right to authorize us to share your non-public personal information with a non-affiliated third party for a purpose that is not specifically authorized by law is called your right to "opt-in" to such information sharing.

OUR PRIVACY POLICY

1. Information we collect:

   We collect non-public personal information about you from the following sources:
   - Information we received from you on applications and other forms (e.g., name, address and telephone number, social security number, date of birth, length of employment, gender, marital status, prior insurance information and length of residency).
   - Information about your transactions with us, our affiliates and others (e.g., insurance coverage selections and premiums, payment and claims history and information necessary for billing and payment).
   - Information we receive from a consumer reporting agency (e.g., credit reports and claims history).
   - Information we receive from a medical information bureau.
   - Any other information we are allowed to collect by law.

2. Information we may disclose to affiliates and non-affiliated third parties:
   - We may disclose all of the information that we collect, as described above, about our customers and former customers, to companies that perform marketing services on our behalf.
   - We also may disclose non-public personal information about our customers and former customers to affiliates and non-affiliated third parties as permitted by law.

3. Non-affiliated third parties to whom we are permitted to disclose non-public personal information:

   We are permitted to disclose non-public personal information about you, such as we have described above, to the following types of third parties that perform services on our behalf or with whom we have joint marketing agreements:
   - Fulfillment service providers, such as envelope stuffing services, billing and enrollment services and printing services.
   - Other third parties that perform services for us that are necessary to effect, administer or enforce your transaction with us (e.g., underwriters, claims representatives, agents and brokers).
   - Financial institutions with whom we have joint marketing agreements, such as insurance providers.

   We also are permitted to disclose non-public personal information about our customers and former customers to non-affiliated third parties as permitted by law.

4. Notification of your right to opt-in to certain disclosures:

   In the future, if we decide to disclose the information we collect about you, as described above, to third parties for purposes other than those described above, which are expressly permitted by GLBA and federal and state regulations implementing GLBA, we will first obtain an opt-in to such disclosures from you; that is, we must obtain your consent to make those disclosures.

SAFEGUARDING AND MAINTATING PERSONAL INFORMATION

We restrict access to non-public personal information about you, which we hold, to those employees and others who need to know that information to provide products or services to you. Their right to further disclose and use the information is limited by our employee code of conduct, applicable law, and non-disclosure agreements where appropriate. We maintain physical, electronic and procedural safeguards that comply with applicable regulatory standards to guard your non-public personal information.