

ING Financial Partners' Privacy Promise

ING Financial Partners, Inc. and its subsidiaries ("ING Financial Partners") take your privacy very seriously. We share a commitment to protect your privacy and the confidentiality of your personal and financial information.

As providers of products and services that involve compiling personal—and sometimes, sensitive—information, protecting the confidentiality of that information has been, and will continue to be, a top priority throughout ING Financial Partners. Whether you are a current customer, former customer, or potential customer, we believe that you should know about the information we collect, the measures we take to safeguard it, and the situations in which we might share information with select business partners. This brochure explains how ING Financial Partners handles—and protects—the personal information we collect. "ING Financial Partners" refers to the ING businesses listed at the end of this notice.

The information we collect and the extent to which we use it will vary depending on the product or service involved. In fact, in certain cases, we may not collect or share some of the types of information noted below. For example, in a number of cases ING Financial Partners may have an agreement with a third party that limits the sharing of information about its customers with another company, even if that company is an ING affiliate. These agreements will continue to be honored. Our privacy promise derives from basic principles of trust, ethics, and integrity:

1. We collect only the customer information necessary to consistently deliver responsive products and services.

ING Financial Partners collects information that helps serve your financial needs; provides high standards of customer service; develops and offers new products or services for our customers and potential customers; and fulfills legal and regulatory requirements. The information collected generally varies depending on the products or services you request and may include:

- Information provided in personal interviews or on applications and related forms, for example, name, address, Social Security number and annual income.
- Responses from your employer, benefit plan sponsor, or association regarding any group products we may provide, for example, name, age, address and Social Security number.
- Third-party reports, such as consumer credit history, motor-vehicle records, demographic, and/or medical information, if relevant to your product or service.
- Information about your relationships with us, such as products or services purchased, and account balances (if applicable), which we may obtain in writing, during telephone or Internet transactions or from data gathering software used when you are accessing ING Web sites.

2. We maintain safeguards to ensure information security.

We have implemented security standards and processes—including physical, electronic and procedural safeguards—to ensure that access to customer information is limited to employees, registered representatives and agents who may need it to do their jobs. They are required to respect the confidentiality of all customer information.

3. We limit how, and with whom, we share customer information.

First and foremost, we do not sell lists of our customers, nor do we disclose customer information to marketing companies outside of ING Financial Partners, with the exception of companies we may hire to provide specific services for us, as described below.

Under no circumstances do we share medical information for marketing purposes.

We will share customer information only for the following reasons:

When it is necessary to disclose information to third parties to effect, administer, or enforce a transaction that you request or authorize—for example, when we provide information we collect to a mutual fund company from which you wish to purchase shares.

When you have requested a life insurance product, the ING life insurance companies may use a common application to avoid multiple medical tests; in this way, the information you provide and authorize us to obtain may subsequently be used by one or all of these companies as necessary to determine—and offer to you—the product most appropriate for your needs.

We may be required by law or regulation to disclose information to third parties—for example, in response to a subpoena; to prevent fraud; and to comply with rules of, or inquiries from, industry regulators.

In some cases, we may share information we collect—for example, name, address, age and Social Security number, with other ING businesses such as our securities broker-dealers or our insurance companies and agencies to process or service a transaction you have requested, to facilitate enhanced customer services, or to inform you of financial products or services you may find useful. In a few cases, another ING business may have a privacy policy that differs from the one stated in this notice.

If that is the case, you will receive a separate privacy notice from that ING business if you are a customer. The registered representative or agent with whom you work to obtain financial products and services may use the personal information about you in his or her files to advise you of other products or to help you with your overall financial strategy.

ING Financial Partners will not share information about you with another ING company that may be used to make insurance underwriting or lending decisions about you, unless you so direct us, or unless we tell you beforehand and give you a chance to say no.

Furthermore, as permitted by federal and state laws, we may share or exchange information with companies engaged to work with us, such as:

- Third-party administrators and vendors hired to effect, administer or enforce a transaction that you request or authorize; to develop or maintain software; or to perform marketing research.
- Financial services entities, such as banks, credit unions, credit union service organizations, thrifts, thrift service organizations, insurance companies, or securities broker-dealers, with which we have joint marketing agreements. The information we may share is described in Section 1.
- Reputable consumer reporting agencies in connection with your application or renewal of insurance coverage.

Other than what is described herein, we won't share information about you with third parties to market products to you, unless we tell you about it first, and give you a chance to say no.

We uphold these privacy principles throughout ING Financial Partners and with our business partners. Companies with which we share customer information are required to maintain the confidentiality of that information. In those states where privacy or consumer information laws are more restrictive than our privacy policy, we will restrict our sharing of your information to comply with state law.

We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with ING Financial Partners. While this policy may change from time to time, you can always review our current policy online at www.INGFinancialPartners.com.

In this notice of our privacy promise, the words "you" and "customer" are used to mean any individual who obtains or has obtained a financial product or service from ING Financial Partners that is to be used primarily for personal, family or household purposes.

Following is a list of the ING companies that this notice applies to, as of September 1, 2007:

ING Advisors Network
ING Brokers Network LLC
ING Insurance Agency, Inc.
ING Insurance Agency, Inc. of Massachusetts
ING Insurance Agency, Inc. of Texas
ING Financial Partners, Inc.