

THE LEGACY FOUNDATION AT SHELL POINT, INC.
PRIVACY STATEMENT

The Legacy Foundation at Shell Point, Inc. (LEGACY) understands how important privacy is to you. Because of our interest in protecting your privacy, we have adopted the following privacy practices:

LEGACY'S Commitment

We understand that you expect privacy and security for your personal and financial affairs. We also understand the importance of safeguarding sensitive information about you and your affairs you have entrusted to us. The staff at LEGACY may access information about you as needed to maintain your accounts or otherwise meet your needs. We may also access your information when fulfilling a request from you for additional services or when exercising our rights under the law or any agreement with you.

We safeguard information in accordance with the procedures and policies of LEGACY and we continually assess new procedures and policies for protecting your information. The staff at LEGACY is trained to understand and comply with these rules.

Information and What We Do With It

We collect, retain and use information to protect and administer your personal, financial and legal affairs. We collect and retain information about you from the following sources only for specific purposes:

- Information provided by you upon enrollment in our bill pay service
- Information provided by you regarding banking accounts
- Information provided by you regarding investment accounts
- Legal or health information that you provide
- Other financial information regarding your expenses and income
- Information you provide in personal consultations
- Information gained from a variety of sources in fulfilling the services we provide for you
- Information that we receive from Shell Point Retirement Community

We do not provide any account or personal information, any health or legal information to third parties unless you have provided authorization to do so. We will not provide your personal information for the purpose of independent telemarketing or direct mail marketing.

LEGACY will need to release confidential information if required by a court order, in response to a subpoena or to fulfill a request for cooperation from law enforcement or other government agencies.

LEGACY honors the confidential nature of our services to clients. It is our policy to release information regarding a client only upon written authorization of the client, or to those individuals or institutions who present legal authorization.

There may be extenuating circumstances that necessitate LEGACY to notify Shell Point Retirement Community or the appropriate authorities, such as any information or event regarding resident abuse, if client is at risk of depleting funds or an incident of fraud on an account. If such events occur, applicable confidential information will be shared with those in authority.

LEGACY's Commitment to Security

The LEGACY has procedures that limit access to personally identifiable information and records to only LEGACY staff. LEGACY staff is educated about the importance of confidentiality and client privacy through our procedures and policies.

The LEGACY assures each client that it will take every effort to handle personal information in a responsible manner. Although we take measures to secure your information, no system is completely secure. Clients should also take care with how they handle and disclose their personal information. If you have questions about how to keep your personal information secure and protect yourself from identify theft, please visit the Federal Trade Commission's website at:
<http://www.ftc.gov/bcp/menus/consumer/data.shtm>.

Keeping Information Current

Keeping your account, personal and legal information accurate and up to date is very important. If you find that your account information is not current, or inaccurate, please notify us. We will correct any erroneous information as quickly as possible.

Please contact The LEGACY at:

The Legacy Foundation at Shell Point, Inc.
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Fort Myers, FL 33908
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