

ING Financial Partners, Inc. Registered Representative's Web Site Privacy Policy

Protecting Your Privacy. ING Financial Partners, Inc. (ING Financial Partners), Registered Representatives respect your right to privacy and are committed to protecting it. Whether you are a current customer or just visiting us online, we are dedicated to keeping any confidential financial information you provide us with secure and confidential. A summary of how we use and how we protect your information both online and in general is set forth below. You should be aware that linked sites (either to or from this web site) may contain privacy or confidentiality provisions that differ from the provisions provided herein. Your use of linked sites is governed by the privacy policies and other terms and conditions of those sites.

Privacy Online

Our web site is a great way for current and potential customers to find out more about ING Financial Partners' products and services. It also offers users some handy "financial calculator" tools and market information. **Rest assured that when you visit our site we will not try to gather any personally identifiable information from you without you knowing it.** The following summarizes the extent to which we gather and use information obtained through our web site:

Cookies. A "cookie" is a small piece of information that our web site may provide to your browser while you are visiting. Most browsers are defaulted to accept and maintain cookies. Our sites create a "temporary" cookie which allows you to view some of our disclosure information. When you close your browser, this cookie is automatically deleted from your system.

Statistical Domain and Access Data. Please note that when you visit our web site, no personally identifiable information about you, such as your e-mail address, will be automatically collected by us. In fact, unless you choose otherwise, the only information we may collect from your visits is some information regarding the domain from which you are connecting to our web site, (i.e., msn.com if you are connecting from Microsoft Network, or aol.com if you are connecting from America Online) and the pages you view while on our site. This information is collected solely for statistical purposes and is not used to identify individuals.

"Contact Us" In some cases, you may actually choose to provide us with your e-mail address or other personal information such as your address or phone number. For example, when you complete our "Contact Us" form, we request certain contact information from you so that we may properly respond to your inquiry. Likewise, if you send us an e-mail for any reason, you are by default providing us with an e-mail address.

Your inquiry, whether it is an e-mail or a "Contact Us" form submission, will be addressed by an ING Financial Partners Registered Representative who is licensed in your state. This is necessary to help insure that your specific inquiry is answered in accordance with the laws and regulations of your state of residence. E-mail addresses or other information you voluntarily provide while visiting our web site are used solely for the purpose of responding to your questions and concerns, and will only be shared with others in accordance with applicable laws and regulations, which in some instances may require sharing such correspondence with our legal and compliance departments or with state and/or federal regulators.

Portfolios. When you visit our site, you may build a portfolio, then monitor and update it using an e-mail address and a password that you have created. We do not have access to the username and password database, which is maintained by a third party host. The database is stored on a secure server to protect information from unauthorized access

using carefully developed security procedures and practices. Information is not shared with ING Financial Partners Registered Representatives at any time.

Protecting our children. We do not knowingly solicit data from children, and we do not knowingly market to children. We recognize that protecting children's identities and privacy online is important and that the responsibility to do so rests with both the online industry and with parents.

Protecting Customer Information In General

Collection, Use and Retention of Customer Information. In the course of doing business, we collect and use various types of information, including information provided by customers through personal interviews, account applications and other forms, as well as information about your transactions with us and our agents and affiliates. We use this information to service your accounts and to help you determine the types of financial products that are best suited to your financial needs and goals. We may also access information about you when considering a request from you for additional services or when exercising our rights or responsibilities under the law or any agreement with you.

Maintaining the Accuracy of Customer Information. Keeping your account information accurate and up to date is very important. If you ever find that your account information is incomplete, inaccurate or not current, please call or write to us at the telephone number or address listed on your account statement. We will correct any erroneous information as quickly as possible.

Protection of Information via Established Security Procedures. We value your privacy and maintain physical, electronic and procedural safeguards to protect your nonpublic personal information. Access to such information is restricted to our employees, representatives and agents with a business reason for access to such information. We safeguard information according to established security standards and procedures, and train our employees and representatives to understand and comply with these protections.

Restrictions on the Disclosure of Account Information with Non-Affiliated Third Parties. ING Financial Partners, Inc. and ING Financial Partners Registered Representatives will only provide personally identifiable nonpublic customer information to non-affiliated third parties when: 1) required by law, or by rules or regulations that govern ING Financial Partners, its affiliates, or the financial institutions that ING Financial Partners has contracted with to provide financial services, 2) required in order to process a transaction with you (such as information provided to our Clearing Brokers or Product Sponsors in order to process a transaction you have requested); or 3) you have been provided with an opportunity to stop us from sharing such information ("opt-out") and you have not exercised such opportunity. Furthermore, whenever we share personally identifiable customer information with non-affiliated third parties, we will insist that the third party agrees to maintain the confidentiality of this information in accordance with all applicable laws.

Sharing information with ING Financial Partners affiliates. As part of ING, one of the nation's largest financial services companies, **ING Financial Partners** has numerous affiliates, including several state chartered insurance agency subsidiaries. Please note that we will continue to share some account information among the ING family of companies as permitted by law. We may do so for internal purposes, in order to process a transaction for you, or to provide you with more value or better service.

Disclosure of Privacy Principles to Customers. We believe that our customers have a right to know how their personal information is collected, maintained and used. To this end, we are committed to providing each of our customers with a summary of our privacy policies each time an account is opened and once a year thereafter. If you ever have any questions regarding these policies, please contact us by selecting the e-mail link in the "Contact Us" section of our site.