

ING Financial Partners' Privacy Policy and Other Important Information

OUR PRIVACY POLICY

Your privacy is a top priority for ING Financial Partners, Inc. and its subsidiaries ("ING Financial Partners"). We take our commitment to protecting the confidentiality of your non-public personal information very seriously.

Please take a moment to review this Privacy Policy. Feel free to contact us with any questions you might have.

Information About You That We Collect

As part of providing services to you, we collect non-public personal information about you—much of which comes directly from you. The information we collect varies depending on the products or services you request and may include:

- Name, address, social security number, birth date, assets, income, account transaction information and employment information as well as information about your accounts with others, information from our affiliates and others about your transactions, and information from account forms and interviews with you.
- Identification and account information from your employer, benefit plan sponsor or association regarding any group product services we may provide.
- Consumer credit reporting agency information concerning your credit worthiness and credit history.
- Information provided when verifying applications or other forms from your current or past employers and from other institutions where you conduct business.

Information We May Disclose

We have implemented security standards and processes—including physical, electronic and procedural safeguards—designed to protect your information. We restrict access to your non-public personal information to those employees and agents who need to know your information to perform their responsibilities or to provide services to you.

We do not sell or disclose your non-public personal information to non-affiliated third-party marketing companies.

We may share your non-public information that we collect with our affiliated companies, including our parent company, as permitted by law. Similarly, to help us provide products or services to you, we may share your non-public personal information with non-affiliated third parties (such as mutual

fund companies, insurance companies or other product sponsors) and non-financial companies (such as consumer reporting agencies, software developers or consulting firms). We may also disclose your non-public information to other financial institutions (such as banks, credit unions, thrifts and trust companies) with which we have joint marketing agreements. These companies are contractually obligated to keep your information confidential and use the information only for the services required or as allowed by applicable law.

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

Other than what is described in this notice, 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.

Other Disclosures We May Make

We recognize that your relationship with your registered representative is important. Should your registered representative decide to move to another broker-dealer, your representative may take your non-public confidential information to a new firm so that he or she can continue to service your account(s) at the new firm if you wish. Similarly, if your account was opened with us because of your relationship with a financial institution, such as a bank, thrift or credit union, and your financial institution decides to enter into a relationship with a new firm to provide investments, we will share your non-public personal information with your financial institution so your account can continue to be serviced at your financial institution. If you do not want ING Financial Partners to disclose your non-public personal information with either your representative or your financial institution, should either move to another broker-dealer, please contact us at 888.825.9130.

Policy Relating to Former Customers

If you decide to close your accounts with us, or become an inactive customer, our Privacy Policy will continue to apply to you.

Changes to Our Privacy Policy

ING Financial Partners maintains a public Web site at www.INGFinancialPartners.com. While this policy is delivered annually in writing, the policy may change from time to

time. We will notify you of any changes. You can always review our current policy, and the names of the ING Financial Partners companies to which the policy applies, online.

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OTHER IMPORTANT INFORMATION

Our public Web site contains additional information that might be of interest to you, including a brochure about investing, a statement about ING Financial Partners' compensation sources and information about our Strategic Partners program.

ING Financial Partners is a member of the Securities Investor Protection Corporation (SIPC). You can obtain information about SIPC, including a brochure, by contacting SIPC at 202.371.8300 or on their Web site at www.sipc.org.

In addition, the Financial Industry Regulatory Authority (FINRA) makes available information about the registration status and/or disciplinary record of broker-dealers and their registered representatives. The information can be obtained by calling toll-free at 800.289.9999. The FINRA Web site contains other useful information for investors at www.finra.org.

In this notice of our privacy policy, 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 October 1, 2009:

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