

What does ONESCO do with your personal information?

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Income
- Assets
- Investment experience
- Account transactions
- Retirement assets

How? When you are *no longer* our customer, we continue to share your information as described in this notice. All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons ONESCO chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ONESCO share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes —to offer our products and services to you	No	We don’t share
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes —information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes —information about your creditworthiness	No	We don’t share
For our affiliates to market to you	No	We don’t share
For non-affiliates to market to you	No	We don’t share

Questions?
Call 513.794.6100 or send a written request to One Financial Way, Cincinnati, OH 45242

SIPC Disclosure
The O.N. Equity Sales Company (ONESCO) is a member of the Securities Investor Protection Corporation (SIPC), which protects securities customers of its members up to \$500,000 (including a maximum of \$250,000 for cash claims). An explanatory brochure is available upon request or at www.sipc.org. You may contact SIPC via telephone at 202.371.8300 or by email at asksipc@sipc.org.

Securities offered through The O.N. Equity Sales Company (ONESCO), Member FINRA/SIPC.

NOT FDIC/NCUA INSURED	NOT BANK/CREDIT UNION GUARANTEED	MAY LOSE VALUE
NOT GUARANTEED BY ANY GOVERNMENT AGENCY	NOT A BANK/CREDIT UNION DEPOSIT	

Who we are	
Who is providing this notice?	<p>In addition to ONESCO, this notice also covers the following affiliated companies:</p> <ul style="list-style-type: none"> • O.N. Investment Management Company (ONIMCO) • Ohio National Insurance Agency, Inc. (ONINSA)
What we do	
How does ONESCO protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>For example, in order to protect the confidentiality of your personal information, we routinely (1) maintain and monitor physical, electronic and procedural safeguards, (2) review our policies and procedures, (3) monitor our computer networks, and (4) test the strength of our security.</p>
How does ONESCO collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account • Purchase investment products • Seek advice about your investments • Enter into investment advisory account <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Our affiliates include, but is not limited to, AuguStarSM Life Insurance Company, AuguStarSM Life Assurance Corporation, National Security Life and Annuity Company, and AuguStarSM Distributors, Inc.
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • ONESCO does not share with non-affiliates so that they can market to you.
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • ONESCO does not have a joint marketing agreement at this time.

O.N. Investment Management Company Form ADV Part II Delivery

If you are a client of the O.N. Investment Management Company (ONIMCO) and would like a copy of Part II of ONIMCO's Form ADV free of charge, please send a written request to the attention of Compliance, P.O. Box 371, Cincinnati, OH 45201.

Privacy Notice for California Residents Only

This Privacy Notice supplements our “Privacy Policies and Practices” and applies only to California residents (“consumers” or “you”).

A copy of our Privacy Policies and Practices can be found at constellationinsurance.com. This Notice is being provided to you to comply with the California Consumer Privacy Act of 2018 (“CCPA”), as amended, and to inform you of your rights and how to exercise those rights under the CCPA.

Your rights under CCPA

The CCPA provides California residents with specific rights regarding their personal information, including the: (1) Right to Know and Access Your Personal Information - You have the right to request that we disclose certain information to you about our collection, disclosure, use and sale of your personal information, including the right to request the specific pieces of personal information collected about you; (2) Right to Correct Your Personal Information – You have the right to request that we correct any inaccurate personal information we maintain about you; (3) Right to Delete Your Personal Information — You have the right to request that we delete the personal information that we have collected and retained about you; (4) Right to Limit Use and Disclosure of Sensitive Personal Information – You have the right to request that we limit our

use and disclosure of your sensitive personal information to that which is necessary to provide goods or services to you; and (5) Right to Opt-Out of the Sale or Sharing of Your Personal Information — You have the right to opt-out of the selling or sharing of your personal information to third parties in exchange for valuable consideration.

Please note, that our use and disclosure of your sensitive personal information is already limited to that which is necessary to provide goods and services to you. Additionally, we do not sell or share the personal information of our consumers to third parties in exchange for money or other valuable consideration. Accordingly, you do not need to opt-out of the sale or sharing of your personal information.

Personal information we collect

We collect personal information about consumers which is defined under the CCPA as information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. In particular, within the last twelve (12) months, we have collected and disclosed for business purposes, the following categories of personal information about consumers:

Category	Examples
Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement
Geolocation data	Physical location or movements
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information
Professional or employment-related information	Current or past job history or performance evaluations
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
Sensitive personal information	Social security, driver's license, state identification card, or passport number; geolocation data; racial or ethnic origin, religious or philosophical beliefs, or union membership; genetic data; health data; sexual orientation

Categories of sources of personal information

For each category of personal information described above, we collect that information from the following categories of sources: (1) directly from consumers or their agents (for example, from documents consumers submit to us in order for us to provide them with products and services); (2) indirectly from consumers or their agents (for example, through information we collect about consumers from consumer reporting agencies, health care providers, government entities, etc. in the course of providing services to them); and (3) directly and indirectly from activity on our website, constellationinsurance.com (for example, from website usage details collected automatically).

Use and disclosure of personal information

We disclose your personal information for business purposes to the following categories of third parties: (1) our affiliated companies; (2) service providers; (3) your agent; and (4) if applicable, your broker/ dealer.

For each category of personal information described above, we may use or disclose that information for the following business purposes:

- To provide you with products or to administer your policy or contract.
- To communicate with you as part of our business.
- For third parties to perform services on your policy or contract.
- For business research and analysis.
- As required or otherwise permitted by law.
- To respond to and resolve complaints.
- To protect against suspected fraud.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes as described herein without providing you notice.

We generally retain our records that contain personal information in accordance with our records retention schedule and as needed to provide you services. We also retain your personal information as required or permitted by law, to comply with our legal obligations, resolve disputes, and enforce our agreements.

How to exercise your rights

You (on behalf of yourself or your minor child), or a person registered with the Secretary of State and authorized by you to act on your behalf, may exercise your CCPA rights described above by submitting a Verifiable Consumer Request to us by calling 800.366.6654, visiting constellationinsurance.com or writing to us at Constellation Insurance, Attn: Legal, One Financial Way, Cincinnati, OH 45242.

The request must provide sufficient personal information about you (for example, your date of birth, address, last four digits of your Social Security number, etc.) to allow us to match that information with the personal information we have already collected and retained about you, in order to verify your identity.

We cannot respond to your request if we cannot verify your identity or authority to make the request, or if we cannot confirm that you are the consumer whose personal information we have collected and retained. Making a request does not require you to create an account with us. We will only use the personal information provided in a request to verify your identity or authority to make the request.

Response time

When possible, we will respond within 45 days of our receipt of your request. If we are unable to meet this deadline we will notify you that we need more time (up to 90 days). We may deny your request if an exemption or exception under the CCPA applies.

Non-discrimination

We will not discriminate against you for exercising any of your rights under the CCPA. We will not: (1) deny you goods or services; (2) charge you different prices or rates for goods or services; (3) provide you with a different level or quality of goods or services; or (4) suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Questions/additional information

For questions or additional information on the CCPA, our Privacy Policies and Practices or this supplement thereto, you may contact us by calling 800.366.6654, visiting constellationinsurance.com or writing to us at Constellation Insurance, Attn: Legal, One Financial Way, Cincinnati, OH 45242.