

PRIVACY POLICY

Revised: 2/6/2007

The notice applies to:

- StanCorp Financial Group, Inc.
- Standard Insurance Company
- Standard Retirement Services, Inc.
- The Standard Life Insurance Company of New York
- StanCorp Mortgage Investors, LLC
- StanCorp Real Estate, LLC
- StanCorp Investment Advisers, Inc.
- Standard Management, Inc.
- StanCorp Equities, Inc.
- StanCorp Trust Company

Please direct inquiries to:

Privacy Notice (P7E)
P.O. Box 711
Portland, OR 97207-0711

The privacy of your personal information is important to us. To help you understand how we protect the information we receive about you, this notice describes our current privacy policy and practices.

We want you to know that:

- We do not sell or rent the information we have about you to anyone;
- We do not share your information with outside companies for the purpose of selling their products or services to you; and
- We do not offer a right to opt out since we only share information about you with others as permitted or required by law.

Information We May Collect and From Whom

We collect your personal information to offer you insurance and financial products and services. The type of information we collect and the extent to which it is used depends on the products and services we provide to you. For example, we may obtain information such as:

- Your name, address, date of birth, telephone number, Social Security number, employment, occupation, assets and income from applications and other forms from you, your employer and others;
- Your policy coverage, claims, premiums and payment history from your dealings with us;
- Your financial and medical history from other insurance companies, the Medical Information Bureau ("MIB") or consumer reporting agencies, if you apply for life or disability insurance;
- Your current and past health condition from medical providers or facilities, with your authorization, if you apply for life or disability insurance; and
- Your use of the services offered on our Web sites from online information collection devices.

We may request an insurance support organization to collect information that we need about you. If we do, they will submit a report to us. They may keep a copy of the report and share its contents with others. They will do this only with appropriate authorization from you.

Information We May Disclose

We may share the types of information described above with others. These disclosures are only made as authorized by you or as permitted or required by law. These may include disclosures:

- To others that perform business services or functions on our behalf or to serve you;
- To employers, to reinsurers, to other insurance companies, and to the MIB for purposes related to insurance you may have or apply for;
- To others that may have a joint marketing agreement with us, unless state law restricts such use;
- To insurance departments in connection with the regulation of our business;
- To law enforcement agencies to help prevent fraud or illegal activities;
- To government agencies to comply with the law;
- To authorized persons to respond to a subpoena, warrant or other court order; and
- To our affiliates who provide insurance or financial products and services to you.

When information about you is disclosed to others, we expect them to protect your information. We expect them to use the information only for the limited purpose for which it was shared. We do not share medical information except with your authorization or as permitted or required by law.

Your Rights

We want to make sure that we have accurate information about you. In general, you have the right to review your personal information that we have. If you believe that any of the information about you is not accurate, you may inform us in writing of any changes you believe should be made. We will review your request and respond to it accordingly.

Confidentiality and Security

We restrict access to information about you to those employees who need to know that information to provide products or services to you. We maintain written privacy policies, as well as physical, electronic and procedural safeguards to protect your information.

Further Information

We will advise you of our privacy policy at least once a year. We may change our privacy policy at any time. As long as you remain a customer, we will inform you of any changes. If your relationship with us ends, we will continue to limit disclosures of your information in accordance with our stated privacy policy.