

# Website Compliance Review

Legal & General America



References to Legal & General America and its products and services—on websites, social media sites, in print and electronic communications and in other media formats—are subject to compliance review.

**When directed to brokers:** Advertising is allowed at all general agency contract levels. Must have prior approval by the agency one level higher in the contract hierarchy and prior approval by the Legal & General America compliance department.

**When directed to consumers:** Advertising is allowed at any contract level with prior approval by the agency one level higher in the contract hierarchy and prior approval by the Legal & General America compliance department.

## Start the Process by Completing the Website Review Request Form

- For websites, submit form LAA1034. For all other advertising and social media, submit form LAA738. See separate guidelines LAA1867.
- Fillable request forms are located in the 'Marketing & Resources' then 'Compliance Review' section of the Partner Dashboard.
- Once approved, a compliance number will be provided.

## Make Sure Your Ad or Website Identifies You and Us

- Identify the insurer and home office location: Legal & General America life insurance products are underwritten and issued by Banner Life Insurance Company, Urbana, MD and William Penn Life Insurance Company of New York, Valley Stream, NY. Banner products are distributed in 49 states and in DC. William Penn products are available exclusively in New York; Banner does not solicit business there.
- Identify yourself and include your business address—street, city and state—and phone number must be included. This must be a name as it appears on the Banner or William Penn contract. Marketing names (DBAs) are permitted if the contracted person/entity is disclosed.
- Advertisements not directed to consumers must clearly state "For broker use only. Not for public distribution".

## Clearly Describe Products

- The words "life insurance" should always be included in your description. Include the type of life insurance (term, universal life, etc.) being advertised if you are referring to it by its marketing name.
- Include policy form numbers and all appropriate disclosure. See preapproved text attached.
- If withdrawals are mentioned, use the words "partial surrenders" and explain that they are subject to surrender charges during the number of years specified in the policy.
- If policy loans are mentioned, explain that interest will be charged on policy loans and that loans may reduce the death benefit of a life insurance policy.

### For us, advertising is defined as:

Verbal, printed or written material designed to create interest in life insurance or in an insurance company, or to induce the public to purchase, increase, modify, reinstate, borrow on, surrender, replace or retain a policy.

### Regardless of media format, if it fits the definition, it is an ad.

Newspaper  
Magazine  
Television  
Radio  
Internet  
Direct Mail  
Billboards  
Brochures  
Flyers  
Social Media  
Statement Stuffers  
Quote Software  
Presentations  
Form Letters  
Electronic Communications

### Materials created for purposes like these must be reviewed:

Interest Generation  
Broker Recruitment  
Rate  
Communication

Product information and especially any material made available to the general public.

The compliance review protects you, Legal & General America and its subsidiaries.

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## Legal & General America

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### **Provide Accurate Quotes and Values**

- Include underwriting assumptions (class, sex, age, tobacco/non-tobacco, bands) and specify that rates are per \$1,000 of coverage when including rate tables. (Note: Rates can NOT be advertised in Florida.)
- Include effective date of rates/premiums.
- Describe payments as premiums, not deposits.
- If quoting premiums, specify whether policy fees are included and the amount of the policy fee. If not guaranteed, state that premiums are subject to change and under what conditions. If you show premiums or values for any non-guaranteed elements, show the corresponding guaranteed premiums or values with equal prominence.
- Make certain that all comparisons are fair, accurate and complete in all respects.
- Include the source of any statistics or performance information.

### **Legal & General America Prohibits**

- Advertising by fax, text, robocall, prerecorded voice message, or auto dialer, or by using any vendor, software, or other technology that offers these services in contravention of the Telephone Consumer Protection Act (TCPA).
- Advertising or publishing commission rates or schedules.
- Implying that life insurance is an investment, savings plan or retirement plan.
- Using testimonials or endorsements by third parties unless they are genuine and pertinent to the product or service being advertised.
- Distributing materials in states where the product you're advertising is not approved or where you are not appointed with Banner or William Penn.

We are counting on you for appropriate due diligence prior to your request for website or social media site review. It is your responsibility to make sure all information maintained on your site is current: Banner and/or William Penn business forms, underwriting criteria and requirements, product descriptions and specifications, illustrations, interest rates, ratings by independent industry organizations and state approvals are examples of information subject to change.

### **We Make Disclosure Easy**

See the pre-approved text on the attached pages for product descriptions and disclosure. Edits to your website that are suggested during the Legal & General America compliance review process must be incorporated before approval.

Websites must be reviewed at least annually and whenever material references to Banner/William Penn are modified.

Websites developed by brokers associated with your agency must be first approved by your BGA and then submitted to Legal & General America for review. Appropriate due diligence is expected.

The Legal & General America companies will assume no liability for inaccuracies. According to ongoing business practices, all general agencies are notified of any product or procedural changes made by Banner or William Penn; agencies are responsible for forwarding that information to their brokers. Websites must be updated to reflect changes within 30 business days of notification.

# Website Compliance Review

Legal & General America

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## **On Every Website**

The name of the person/people/entity contracted to represent Banner and/or William Penn must appear in a prominent place. The name must be identical to that which appears on the Banner or William Penn broker/agency agreement. Marketing names (DBAs) are permitted, however the contracted person/people/entity must also be disclosed.

Your business address—street, city and state—and phone number must be included.

Compliance with state regulations governing interaction with brokers/customers in all states is expected. Your website should disclose the states where you are (or are not) contracted and licensed to write business with Banner and/or William Penn.

You must be able to provide assurance that necessary precaution has been taken to protect the privacy of sensitive personal information entered by or about consumers on your site or accessible at your site. The Gramm-Leach-Bliley Act (GLB) requires any person involved in the handling of nonpublic personal information, including BGAs and brokers, to adhere to privacy standards.

If your website lists or provides product descriptions for specific Banner and/or William Penn products, appropriate disclosure must be made on each product page (or the pages must include highly visible links to separate pages which provide this disclosure). The text on the following pages can be used for this purpose. While this exact language does not have to be used, (all of it may not be required because that is determined by the detail in your product description), your site must include accurate alternatives for the specific issues our suggested text addresses.

## **If Your Website Audience Is Only Brokers**

"For broker use only. Not for public distribution." should be clearly noted, preferably on the bottom of each page.

If it is possible to download illustration software from your site, it is your responsibility to provide appropriate security to prevent consumer access and to assure that this is a service provided only to contracted Banner and/or William Penn brokers. It is also your responsibility to make sure the most current illustration software is used.

Commissions may not be advertised; commission rates and schedules cannot be posted.

## **If Your Website Is For Consumers**

Product and/or purchase materials developed for and distributed to potential clients, as a result of responses to your website, must include all appropriate disclosure information and must be submitted in conjunction with your request for compliance review.

## **If Your Website Includes Rates, Provides Quotes or Offers Online Application**

Appropriate disclosure must be made on each product and/or quote page (or the pages must include highly visible links to separate pages which provide this disclosure). The text on the following pages can be used for this purpose. While this exact language does not have to be used, your site must include accurate alternatives for ALL of the specific issues our suggested text addresses.

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The most current Banner and/or William Penn rates and underwriting classes/requirements/criteria must be used. It is your responsibility to use Banner/William Penn approved resources for this data and to verify its accuracy on your site.

When using generic descriptions of underwriting classes, you must indicate that the number of classes and class criteria varies by company.

Requests to populate Banner and/or William Penn applications or new business forms with consumer data are individually considered. Questions asked on-line must be identical to those which appear on the Banner and/or William Penn forms. Form samples with populated data must be submitted independently for review. If your request for review did not include these samples, authorization to use them will not be granted.

Do not use the words “apply” or “application” unless your site uses the exact application (or asks questions identical to the entire application) which have been filed by Banner and/or William Penn and approved for use in specific states.

### **If You Use a Third-Party Vendor for Website Services**

Compliance approval is not automatic for third-party services for forms, quotes or product information included on your website. It is your responsibility to make sure updates are implemented in a timely manner and to check the accuracy of what is posted and to notify the source as appropriate.

Forms and rate files are automatically distributed to approved third-party vendors.

### **If Your Website Includes Links To Other Banner / William Penn Materials**

Unless they have been created by us, broker or customer communications referenced on your site, or sales and presentation materials not shown in their entirety on your site, but which may result in the sale of a Banner and/or William Penn product, must be submitted independently for review.

Materials posted to partner.lgamerica.com for agency use in JPEG or PDF format do not require a separate review as long as they are not altered other than the addition of agency contact identification (which must include your office street address, city, state and phone number).

### **If Your Website Includes Links To Any Legal & General America Website**

It is your responsibility to make sure your website is linked only to [www.lgamerica.com](http://www.lgamerica.com) or the home page of the Partner Dashboard ([partner.lgamerica.com](http://partner.lgamerica.com)), or with prior approval, to the forms page (so appropriate security measures can be taken to eliminate access to other agency data). Access to information on [partner.lgamerica.com](http://partner.lgamerica.com) other than the home page is limited to individuals contracted with Banner or William Penn and can only be accessed through the log-on procedures.

# OPTerm 10, 15, 20, 25, 30, 35, 40

## Disclosures and Product Information

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### **STEP 1 (Use disclosure to identify the companies that make up Legal & General America)**

Legal & General America life insurance products are underwritten and issued by Banner Life Insurance Company, Urbana, MD and William Penn Life Insurance Company of New York, Valley Stream, NY. Banner products are distributed in 49 states and in DC. William Penn products are available exclusively in New York; Banner does not solicit business there. The Legal & General America companies are part of the worldwide Legal & General Group.

### **STEP 2 (Add for Banner, William Penn or both)**

#### **Both companies**

OPTerm policy form # ICC21-DTCV and state variations. In New York, OPTerm policy form # DTCV21-NY.

#### **Banner only**

OPTerm policy form # ICC21-DTCV and state variations.

#### **William Penn only**

OPTerm policy form # DTCV21-NY.

### **STEP 3 (If you mention premiums, add disclosure that applies for either company)**

#### **Banner only**

The Banner OPTerm life insurance premiums quoted here are based on the information provided for this quote. The quote is based on the assumption of excellent health and does not take into consideration occupational risks or other avocations. Approval and actual premiums will be based upon the entire underwriting process, including but not limited to, information provided on the application, exam results and specific underwriting requirements and criteria.

OPTerm 10, 15, 20, 25, 30, 35 and 40 are term life insurance policies. OPTerm 10 issue ages are 20-75 all classes. OPTerm 15 issue ages are 20-75 all classes. OPTerm 20 issue ages are 20-70 for nontobacco classes and 20-65 for tobacco classes. OPTerm 25 issue ages are 20-60 for non-tobacco classes and 20-55 for tobacco classes. OPTerm 30 issue ages are 20-55 for non-tobacco classes and 20-50 for tobacco classes. In New York, the following issue ages apply: OPTerm 10 issue ages 20-75 non-tobacco classes; 20-75 tobacco classes. OPTerm 15 issue ages 20-71 non-tobacco classes; 20-71 tobacco classes. OPTerm 20 issue ages 20-65 for non-tobacco classes, 20-64 for tobacco classes. OPTerm 25 issue ages are 20-58 for non-tobacco classes and 20-55 for tobacco classes. OPTerm 30 issue ages 20-51 for non-tobacco classes; 20-50 for tobacco classes. OPTerm 35 issue ages 20-50 for non-tobacco classes; 20-45 for tobacco classes. OPTerm 40 issue ages 20-45 for non-tobacco classes; 20-40 for tobacco classes. Premium rates vary by coverage amount: \$100,000-\$249,999, \$250,000-\$499,999, \$500,000-\$999,999, \$1,000,000 and above. Premiums quoted include a \$60 annual policy fee. Initial premiums remain level for 10, 15, 20, 25, 35 and 40 years respectively. After the initial level term period, premiums increase annually to age 95. OPTerm 10, 15, 20, 25, 30, 35 and 40 can be issued in preferred plus non-tobacco, preferred non-tobacco, standard plus non-tobacco, standard non-tobacco, preferred tobacco, and standard tobacco rates. Substandard policies can be issued through table 12 subject to underwriting discretion. Policies can be returned without obligation within 30 days of receipt. Rates as of 10.15.2021.

# OPTerm 10, 15, 20, 25, 30, 35, 40

## Disclosures and Product Information

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An Accelerated Death Benefit Rider, policy form # ICC10 ADB and state variations, is included with all policies. If the Accelerated Death Benefit is paid, it may affect the policy's cash value, death benefit, premium and policy loans or liens.

Additional Insurance Riders, form # ICC11 AIR and state variations, can provide temporary life insurance coverage for 10, 15 or 20 years after which coverage ceases. Term Riders issue ages vary from base plan. A Waiver of Premium Benefit Rider is available, policy form # ICC09 WPTR and state variations. Children's Life Insurance Rider, form # ICC16-CLIR and state variations, can provide life insurance coverage on eligible children. Children's Life Insurance Rider is not available in New York or Maryland and is not available on base plans with Term Riders or in conjunction with A-List Term. Children's Life Insurance Rider premiums are guaranteed to stay level. Coverage expires at the earlier of the insured child's 25th birthday, the base policy insured's 65th birthday or base policy termination.

### **William Penn only**

The William Penn OPTerm life insurance premiums quoted here are based on the information provided for this quote. The quote is based on the assumption of excellent health and does not take into consideration occupational risks or other avocations. Approval and actual rates will be based upon the entire underwriting process, including but not limited to, information provided on the application, exam results and specific underwriting requirements and criteria.

OPTerm 10, 15, 20, 25, 30, 35 and 40 are term life insurance policies. OPTerm 10 issue ages 20-75 non-tobacco classes; 20-75 tobacco classes. OPTerm 15 issue ages 20-71 non-tobacco classes; 20-71 tobacco classes. OPTerm 20 issue ages 20-65 for non-tobacco classes, 20-64 for tobacco classes. OPTerm 25 issue ages are 20-58 for non-tobacco classes and 20-55 for tobacco classes. OPTerm 30 issue ages 20-51 for non-tobacco classes; 20-50 for tobacco classes. Premium rates vary by coverage amount: \$100,000-\$249,999, \$250,000-\$499,999, \$500,000-\$999,999, \$1,000,000 and above. Premiums quoted include \$60 annual policy fee. Initial premiums remain level for 10, 15, 20, 25 and 30 years respectively. After the initial level term period, premiums increase annually to age 95. OPTerm 10, 15, 20, 25 and 30 can be issued in preferred plus non-tobacco, preferred non-tobacco, standard plus non-tobacco or standard non-tobacco, preferred tobacco and standard tobacco rates. Substandard policies can be issued through Table 12, subject to underwriting discretion. Policies can be returned without obligation within 30 days of receipt. Rates as of 3.8.2021.

An Accelerated Death Benefit Rider, policy form # ADB (07-10), is included with all policies. If the Accelerated Death Benefit is paid, it may affect the policy's cash value, death benefit, premium and policy loans or liens.

Additional Insurance Riders, form # AIR (1-11) and state variations, can provide temporary life insurance coverage for 10, 15 or 20 years after which coverage ceases. Term Riders issue ages vary from base plan. A Waiver of Premium Benefit Rider is available, policy form # WPTR.

### **STEP 4 (add for either company)**

Two-year contestability and suicide provisions apply. Policy descriptions provided here are not a statement of contract. Please refer to the policy forms for full disclosure of all benefits and limitations. "For broker use only. Not for public distribution." (Quoted text not required if advertising is for consumer use) <Insert Compliance #>

# Life Step Universal Life

## Disclosures and Product Information

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### **BANNER LIFE INSURANCE COMPANY**

#### **STEP 1 (Use disclosure to identify the companies that make up Legal & General America)**

Legal & General America life insurance products are underwritten and issued by Banner Life Insurance Company, Urbana, MD and William Penn Life Insurance Company of New York, Valley Stream, NY. Banner products are distributed in 49 states and in DC. William Penn products are available exclusively in New York; Banner does not solicit business there. The Legal & General America companies are part of the worldwide Legal & General Group.

#### **STEP 2 (Add for Banner Life Step UL)**

Policy form # ICC19 ULS20 and state variations. Life Step UL is a flexible premium universal life insurance plan. This product offers a coverage guarantee to maturity at age 121 if the appropriate premium according to policy terms is paid on time. The policy will not lapse if the coverage guarantee requirement is met. A policy loan however, that exceeds the cash surrender value will result in a lapse of coverage. Signed illustrations are required for Life Step UL.

#### **STEP 3 (For websites that provide Life Step UL premium quotes, use disclosure that applies)**

The Banner life insurance premiums quoted here are based on the information provided for this quote. The quote is based on the assumption of excellent health and does not take into consideration occupational risks or other avocations. Approval and actual rates will be based upon the entire underwriting process, including but not limited to, information provided on the application, exam results and specific underwriting requirements and criteria.

Life Step UL policies can be issued ages 20-85, in underwriting classifications preferred plus non-tobacco, preferred non-tobacco, standard plus non-tobacco, standard non-tobacco, preferred tobacco and standard tobacco classes. Substandard policies can be issued through Table 12, subject to underwriting discretion. Minimum face amount is \$50,000. Current cost of insurance rates varies by underwriting class. Access to account value will result in a surrender charge that is applicable during the first 9 policy years.

Partial surrenders are allowed in approved states. Current interest and cost of insurance charges used to calculate the policy account value are not guaranteed and may be changed by Banner at any time for any reason, subject to contractual limits. Additional expense charges will apply. The coverage guarantee amount is used to determine whether or not a policy will lapse and is calculated in a similar manner as the policy account value, using different charges and interest. The coverage guarantee cost factors are guaranteed not to change. Rates as of 07.01.14.

An Accelerated Death Benefit Rider, policy form # ICC10 ADB and state variations, is included with all policies. If the Accelerated Death Benefit is paid, it may affect the policy's cash value, death benefit, premium and policy loans or liens.

#### **STEP 4 (Add for Banner Life Step UL)**

Two-year contestability and suicide provisions apply. Policy descriptions provided here are not a statement of contract. Please refer to the policy forms for full disclosure of all benefits and limitations. "For broker use only. Not for public distribution." (quoted text not required if advertising is for consumer use) <Insert Compliance #>



# Life Step Universal Life

## Disclosures and Product Information

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### **STEP 1 (Use disclosure to identify the companies that make up Legal & General America)**

Legal & General America life insurance products are underwritten and issued by Banner Life Insurance Company, Urbana, MD and William Penn Life Insurance Company of New York, Valley Stream, NY. Banner products are distributed in 49 states and in DC. William Penn products are available exclusively in New York; Banner does not solicit business there. The Legal & General America companies are part of the worldwide Legal & General Group.

### **STEP 2 (Add for William Penn Life Step UL)**

Policy form # ULS20-NY. Life Step UL is a flexible premium universal life insurance plan. This product offers a coverage guarantee to maturity at age 121 if the appropriate premium according to policy terms is paid on time. The policy will not lapse if the coverage guarantee requirement is met. A policy loan however, that exceeds the cash surrender value will result in a lapse of coverage. Signed illustrations are required for Life Step UL.

### **STEP 3 (For websites that provide Life Step UL premium quotes, use disclosure that applies)**

The William Penn life insurance premiums quoted here are based on the information provided for this quote. The quote is based on the assumption of excellent health and does not take into consideration occupational risks or other avocations. Approval and actual rates will be based upon the entire underwriting process, including but not limited to, information provided on the application, exam results and specific underwriting requirements and criteria.

Life Step UL policies can be issued ages 20-85, in underwriting classifications preferred plus non-tobacco, preferred non-tobacco, standard plus non-tobacco, standard non-tobacco, preferred tobacco and standard tobacco classes. Substandard policies can be issued through Table 12, subject to underwriting discretion. Minimum face amount is \$50,000. Current cost of insurance rates varies by underwriting class. Access to account value will result in a surrender charge that is applicable during the first 9 policy years. Partial surrenders are not allowed. Current interest and cost of insurance charges used to calculate the policy account value are not guaranteed and may be changed by William Penn at any time for any reason, subject to contractual limits. Additional expense charges will apply. The coverage guarantee amount is used to determine whether or not a policy will lapse and is calculated in a similar manner as the policy account value, using different charges and interest. The coverage guarantee cost factors are guaranteed not to change. Rates as of 08.28.14.

An Accelerated Death Benefit Rider, policy form # ADB (07-10) is included with all policies. If the Accelerated Death Benefit is paid, it may affect the policy's cash value, death benefit, premium and policy loans or liens.

Signed illustrations are required for Life Step UL.

### **STEP 4 (Add for Banner Life Step UL)**

Two-year contestability and suicide provisions apply. Policy descriptions provided here are not a statement of contract. Please refer to the policy forms for full disclosure of all benefits and limitations. "For broker use only. Not for public distribution." (quoted text not required if advertising is for consumer use) <Insert Compliance #>



# Implied Consent

## Usage Policy for the Partner Dashboard

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If you use the Legal & General America Partner Dashboard ([partner.lgamerica.com](http://partner.lgamerica.com) - or your website links to it), the following usage policy applies. Using the website implies consent to the policy.

### **Purpose**

The purpose of this policy is to ensure that general agents, their agency employees and associates, and brokers who do business with Banner Life Insurance Company and/or William Penn Life Insurance Company of New York, understand the circumstances in which they may utilize the Legal & General America Partner Dashboard. While the primary focus of this policy is on the use of the internet, the policy covers all types of electronic communications.

### **Conditions of Use**

By using the Partner Dashboard, you signify your consent to be bound by the terms and conditions of usage as we have outlined below. Please read these terms and conditions carefully before using this site. The Legal & General America companies may revise these terms and conditions at any time. You are bound by any such revisions and should therefore periodically visit this page to stay current with the latest information related to conditions of use.

### **Confidentiality**

Personal information concerning company employees, brokers, policyholders, customers, or others on whom data is collected, stored, or processed via the internet must be kept confidential except for necessary disclosures for legitimate required business purposes which pertains to Banner and/or William Penn. Personal information would include, but is not limited to the following: mental or physical health records, medical records, other insurance coverage information, hazardous activity information, character and reputation information, mode of living information, financial information, vocational information, and information regarding personal traits, underwriter notes and comments regarding the risk, coverage amounts applied for, premiums and application file numbers. To protect customer information, you must use appropriate security devices that will keep unauthorized users from accessing information within your computer network, and will secure customer data when it is being transferred.

### **Agency/Broker Numbers and Passwords**

Your agency number and password provide access to restricted sections of the Partner Dashboard and you are responsible for all activities executed after this secured log-on. To meet this responsibility, you must have secure passwords and keep them confidential. Giving your password to an unauthorized person or attempting to gain access to resources for which you are not authorized, is a serious breach of security.

### **Activity Not Permitted**

Your access to the Legal & General America Partner Dashboard ([partner.lgamerica.com](http://partner.lgamerica.com)) cannot be used under the following conditions:

To provide or transmit unapproved information about the Legal & General America companies such as customer lists, proprietary product information, and proprietary information on how the companies conduct business;

When it interferes with the operation of the Internet gateways;

As a method to illegally discriminate and/or harass on the basis of race, sex, color, religion, age, disability, sexual preference or national origin.

### **Website Links**

Some of the pages on the Partner Dashboard provide links to other sites created by other organizations. Such external Internet addresses contain information created, published, maintained or otherwise posted by organizations independent of the Legal & General America companies. The Legal & General America companies do not endorse, approve or certify any information, product or service referenced or provided at such addresses.