



Privacy Policy for California Residents

Sagicor Life Insurance Company ("Sagicor") significantly values your trust in us. We truly understand our duty to protect and responsibly use the information that you share with us, and we pledge our commitment to fulfilling that responsibility. This Privacy Policy provides information regarding how we collect, use and safeguard your personal information. If you are a consumer currently residing in California and we hold personal information relating to you, you may have additional rights under California law. This Privacy Policy explains what information we collect, how we use it, whether we share any of your personal information and what options you have if you would like to exercise your rights under the California Consumer Privacy Act ("CCPA"). This Policy applies to Sagicor Life Insurance Company and all its affiliate companies doing business in California (collectively referred to as "Sagicor").

INFORMATION WE COLLECT AND HOW WE USE IT

If you are one of our customers or a prospective customer, Sagicor may obtain financial, health, and other information about you to provide services to you. This information may be obtained from one or more of the following sources:

- Information you provide on the insurance application and other forms;
- Information from your insurance agent;
- Information from your transactions with us;
- Information from consumer reporting agencies;
- Information from public records, including driving, tax, property, utility, lien, judgement, and criminal records;
- When you apply for a life insurance policy, individually identifiable health information from your health care providers; and
- Information from our website, consumer portals, and mobile applications, such as site visit data and information collection devices (cookies).

From these sources we may obtain information such as:

- Name, address (e-mail address, if applicable), telephone number, date of birth, Social Security Number or other taxpayer identification number;
- With your authorization, health information;
- Driver's License Number, and accident and violation history;
- Credit information and information about previous insurance transactions;
- Banking information;
- Payment & account history, including claims information; and

- Property, tax and utility payment, lien, judgement, and criminal history, if any.

INFORMATION WE SHARE.

We will not disclose our current and former customers' information to affiliated or nonaffiliated third parties, except as permitted by law. To the extent permitted by law, we may disclose to either affiliated or nonaffiliated third parties all of the information that we collect about our customers, as described in this section.

In general, any disclosures to affiliated or nonaffiliated third parties will be for the purpose of obtaining services so that we may more efficiently administer your policy and process the transactions and services you request. Our agreements with third parties require them to use this information responsibly and restrict their ability to share this information with other parties. **We do not sell information to either affiliated or non-affiliated parties.**

We also may disclose the information we obtain about you to companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements. The information we may share may include your name, address and phone number, and the product(s) you own.

We do not internally or externally share health information other than, as permitted by law, to process transactions or to provide services that you have requested. These transactions or services include, but are not limited to, underwriting life insurance policies, obtaining reinsurance on life policies and processing claims for waiver of premium, accelerated death benefits, terminal illness benefits or death benefits.

You should know that if your producer is independent of Sagicor, he or she is responsible for the use and security of information you provide him or her. Please contact your producer if you have questions about his or her privacy policy. When we share personal information with a non-affiliated third party, that third party cannot use the information except to perform services for us, or as may be permitted or required by law.

To determine eligibility of applicants for certain products and to offer products and services tailored to meet prospective customers' needs, we may on occasion collect information that falls into one or more of the categories described as follows.

Category	Examples	Collected by Sagicor
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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. Some personal information included in this category may overlap with other categories.	YES
C. 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).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. 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.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES*
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

** We collect information from visitors to our website and registered users of our mobile applications by two methods, voluntary submission at the user or website visitor's discretion and aggregated usage statistics tracked by our service providers. For additional information regarding our use of data analytics on our websites and mobile applications, please review the Terms and Conditions posted on our website (<https://www.sagicor.com/en-us/legal/terms-and-conditions>).*

YOUR OPTIONS AS A CONSUMER

Requests for Information

If you are a resident of California, you have the right to know whether we have collected any personal information relating to you and you can ask for a report detailing what information we currently have in our records. This report will specify all information collected within the 12 months preceding the date we received your request. You may make additional requests up to a maximum of two requests in a 12-month period.

Requests to Delete Information

You also have the right to request that any personal information we have collected about you be deleted from our records. Deletion requests may be submitted using the same methods outlined above and are subject to the same identity verification procedures.

Please note that under California law, information cannot be deleted or destroyed when used for one or more of the following purposes:

- To fulfill regulatory, statutory or legal obligation, including those assigned in a court of law or on a contractual basis.
- To complete an authorized business transaction or maintain an existing account.
- To comply with regulatory reporting requirements under the Gramm-Leach Bliley Act.
- To comply with the California Electronic Communications Privacy Act.
- To exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- To debug or identify and repair errors that impair existing intended functionality of our systems.
- To engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of a consumer based on the consumer's relationship with Sagikor.
- To otherwise use the personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

If you have made a request for deletion and our purpose for retaining the information falls under any of these exempt categories, we will provide you with written notice of the basis for declining your request

Submitting Requests

Requests for additional information or for deletion of your information can be sent by:

- Submitting an inquiry using our online form:
www.sagikor.com/en-US/legal/privacy/ca

Mailing a written request to:

Sagikor Life Insurance Company
Attn: Privacy Division, Legal & Compliance
8660 E Hartford Drive, Suite 200
Scottsdale, Arizona 85255

- Calling our Client Services Department toll-free: 1-888-724-4267

For additional information regarding the process for submitting privacy inquiries and to view a copy of our *Privacy Notice for California Residents*, please visit our website - <https://www.sagikor.com/en-US/Legal/Privacy/CA>.

QUESTIONS. As outlined in this Policy and the Privacy Notice for California Residents, you have the right to know what types of information we have about you and if you believe any of the information we have is erroneous you may request that this information be corrected. Requests for correction must be submitted in writing. If we do not agree that the information requires correction, we will notify you and you are entitled to file a statement of disagreement. We will file your statement with a copy of the subject information. You also have the option to file a complaint with the Attorney General.

If you have questions regarding this document or our privacy practices in general, please contact us.