

## CALIFORNIA CONSUMER PRIVACY ACT NOTICE

At Transamerica, it is important to us that you understand how we use and share your personal information. This California Consumer Privacy Act (“CCPA”) notice (“Notice”) outlines our use and disclosure of personal information. This Notice identifies the categories of personal information we collect, describes how we use and share personal information, and explains how California residents can make certain requests regarding their personal information.

### **Categories of Information Collected**

The categories of personal information we collect about you depend on what you share with us, the product(s) you have purchased from us, and the service(s) you receive from us. Below, we describe the categories of personal information we have collected in the last 12 months and how we disclose this information to third parties:

- Identifiers such as name, postal address, date of birth, email address, social security number, driver’s license number, passport number, or other information that identifies you
- Demographic and other information considered to be protected classifications under federal or California law, such as age, race, disability, criminal history, marital status or medical condition
- Personal information as defined in the California customer records law such as signature; insurance or other policy number; financial information, including as submitted by you related to your specific financial condition, accounts or assets, or which relate to a product sold, serviced or issued by us; and health, prescription or medical information you have provided to us or authorized us to access
- Commercial information, such as transaction information and purchase history, and information relating to your business and property interests
- Biometric information such as voiceprints
- Internet or network activity information, such as search and browsing history, login credentials, IP address, and device and advertising identifiers
- Geolocation data
- Audio information such as a voice recording
- Professional or employment-related information, such as past and present work history, affiliations, education and employment
- Inferences which we may generate or acquire relating to your preferences, attitudes, characteristics or behaviors

### **Sources from Which Personal Information is Collected**

We collect these categories of personal information from a variety of sources, including yourself and other sources authorized by you either on this Site or via processing/servicing a product or an application for a product, for example, from your doctor, financial advisor, or credit reporting agency, or other sources needed to underwrite or issue a product or complete a transaction. Internet information may be collected from devices you use to access our websites and services (including through cookies and similar technologies). Inferences and other categories of personal information may be collected from third parties such as social media providers, advertising networks, marketing and analytics providers, and data brokers. More details may be found in our [Online Privacy Statement](#) (see “What Data We Collect About You and How”).

### **Business or Commercial Purposes of Use of Personal Information**

We may use personal information for business or commercial purposes including: i) evaluating eligibility for products or services; ii) administering our products, providing services, and delivering content; iii) product pricing, development, and quality assurance; iv) actuarial and research studies, and other technological development and analytics; v) legal and regulatory filings, auditing, and compliance; vi) identity verification, fraud prevention, and information security; vii) supporting, debugging, and maintaining information systems; viii) marketing, advertising, promotions, and sales; and, ix) other operational purposes compatible with the uses related to your initial disclosure. More details may be found in our [Online Privacy Statement](#) (see “How We May Use the Data We Collect”).

### **To Which Categories of Third Parties is Information Disclosed or “Sold”?**

Information included under the categories listed above is disclosed to affiliates, to service providers, as authorized by you, or as required by law. This includes: companies who help us process claims, maintain accounts, and support marketing and sales; credit bureaus; insurance regulators, law enforcement, government authorities and third parties in response to legal processes or to determine eligibility for public benefits; health care professionals (e.g., to verify coverage or provide information relating to a medical condition); other insurance companies (including successor insurers), agents and

insurance support organizations to coordinate benefits or in connection with insurance transactions involving you; group policyholders (e.g., regarding claims experience, benefits administration or service audits); certificate or policyholders (e.g., regarding the status of an insurance transaction); those with a legal or beneficial interest in your assets (e.g., a creditor); employer or plan sponsor (e.g., to support administration of employee accounts as permitted by law); your representatives and lawyers; to prevent or prosecute fraud or crime; to researchers or professional advisers (such as for actuarial or research studies); and to a purchaser, underwriter, or others in connection with the sale or merger of all or part of our business. Some information in the following categories may be “sold”, as defined under California law, to third-party marketing and analytics partners, including to other financial institutions for joint marketing, including via cookies or similar technologies, and in connection with targeted advertising efforts: identifiers, protected classifications, geolocation data, and inferences.

### **Sales of Minors’ Personal Information**

We do not sell the personal information of individuals we know to be under the age of 16.

### **Your California Consumer Privacy Rights**

As a California resident, you have certain rights to make requests regarding your personal information (“Consumer Requests”):

1) **Right to Know**: You have the right to request that we disclose what personal information we collect, use, disclose, and sell, including: i) specific pieces of information that we have collected about you; ii) categories of personal information we have collected about you; iii) categories of sources from which the personal information is collected; iv) categories of personal information about you that we sold or disclosed for a business purpose; v) categories of third parties to whom the personal information was sold or disclosed for a business purpose; and vi) the business or commercial purpose for collecting or selling personal information. Please note that Transamerica is not obligated to respond to a California resident’s Request to Know more than twice in any 12-month period. Because the information you’re requesting is sensitive, prior to sending you your personal information report we will need to verify your identity as noted below.

2) **Right to Delete**: You have the right to request that we delete personal information we have collected about you, subject to Transamerica’s legal rights or obligations to retain such personal information (for example, we have a legal obligation to retain information regarding your account while your account is active and for at least seven years thereafter, we are required to retain a record of your deletion request, we may retain data in archive systems, etc.). Please note that once we delete your information, we cannot restore it.

3) **Right to Opt-Out**: You have the right to opt out of the “sale” of your personal information to a third party. While we generally do not sell personal information, some personal information under the Demographic, Identifying, or Consumer categories may be considered a sale in the course and scope of certain marketing efforts (all consistent with our obligations under other applicable laws and regulations).

You can also make a Consumer Request by calling Transamerica, toll-free, at 877-247-2401.

Transamerica publishes its response metrics related to Consumer Requests [here](#).

### **Verification Process & Authorized Agents**

Upon receipt of a Consumer Request, we will seek to verify your identity to our reasonable satisfaction before responding. This may require you to submit personal information to us during the verification process. You may authorize another individual to submit a Consumer Request on your behalf through the means indicated above. We may require the authorized agent to provide proof of your signed permission to submit the request and may require you to do one of the following: i) verify your identity directly with us; or ii) directly confirm to us that you have provided the authorized agent permission to submit the request.

### **Non-Discrimination**

You have the right to be free from unlawful discrimination for exercising your privacy rights under the CCPA. In response to your exercise of your rights, we may not: i) deny goods or services; ii) charge different prices or rates for goods or services, including through discounts or other benefits, or imposing penalties; iii) provide a different level of quality of goods or services; or iv) suggest that you will receive a different price or rate for goods or services, or a different level or quality of goods or services. We may, however, charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by your personal information. We may limit our response to your rights as permitted by applicable law.

### **Contact Us**

If you have questions or any concerns, please call our toll-free number: 877-247-2401 or reach out to us via email: [consumerdatarequest@transamerica.com](mailto:consumerdatarequest@transamerica.com).