Transamerica Online Privacy Statement

Effective Date: April 30, 2023

This Online Privacy Statement ("Statement") applies to this website or mobile application and the websites or mobile applications of Transamerica Corporation, and any of its U.S. subsidiaries and affiliates (collectively “Transamerica”, “we”, “us” or “our”) that link to this Statement (the “Online Services”). We understand that the privacy and security of your information is important to you. This Statement describes how we collect, use and share your information.

This Statement does not apply to information collected or received through other means, to information collected by any third party, including websites or applications we may link to, or the collection, use and sharing of deidentified or anonymous data. Additionally, depending on how you interact with us and which products and services (“Products”) you use, additional Transamerica privacy policies may apply. For more information, see the Additional Privacy Notices section below.

From time to time, we may clarify, revise, or update this Statement. This may include making changes to the way we collect, maintain and store information. If we make any changes to this Statement, we will revise the effective date at the top of the Statement. Changes to this Statement will be effective once they are posted.

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Information We Collect
We collect different types of information for our business purposes from the following sources:

Information You Provide. We collect information that you provide to us through the Online Services, when you upload information or documentation, surveys and other communications. We may collect information from entities you have requested or authorized to provide information to us in connection with a Product (such as your employer or plan sponsor). For example, we collect information through the Online Services when you:

- purchase or request a quote for a Product;
- register for, manage or update a Product;
- use our e-Billing services or managing your online account and investment options through the Online Services;
- use Online Service tools, calculators, and other resources that request your, your family’s or your beneficiary’s information;
- access other applications and services from the Online Services, such as applying for a job or using the Locate an Agent function;
- subscribe to newsletters or other communications from us;
- provide feedback, request information, or otherwise contact us through the Online Services;
participate in social media platforms where Transamerica maintains a presence, such as Facebook, Twitter and LinkedIn, or when you make information available to us and others via social media or via forums, blogs, email lists, chat rooms, or other similar technologies;
- participate in surveys, sweepstakes or other promotions;
- conduct searches through the Online Services; and/or
- otherwise share information about yourself through the Online Services, or authorize a third party to share such information about you with us.

We may collect the following information, including as reasonably required to complete a request, provide a Product, or complete a transaction on your behalf: first and last name, home or other physical address, telephone number, email address, other identifiers that permit an individual to be contacted physically or online, date of birth, Product numbers, data about transactions with us (such as account balances, coverages and benefits, and payment and claims history), education information, professional information, employment information, medical and health information, banking information, credit card number and other financial information, government ID (e.g., social security, passport or driver's license numbers), age, race, disability status, criminal history, marital status, gender, security credentials (such as passwords and voiceprints) and other information.

**Information Collected Automatically.** We may collect information automatically using data collection technology, such as cookies, web beacons, pixel tags or other similar current and future technologies as they develop (the “Data Technology”). We may have access to information automatically collected by Data Technologies across our websites and mobile applications and third-party websites and mobile applications, or as compiled by our Advertising Partners, described below.

When you download or use our mobile applications or use mobile devices to access our websites, we may receive information about your location and your mobile device. This may include a unique identifier for your device, device settings, analytical information about how you use your mobile device and other information that may be stored on or accessed through your mobile device. In some cases, we may receive information from mobile applications not operated by us or from other devices connected to your mobile device.

Information collected automatically, including through Data Technologies, may include: your IP address and associated activity tracking; the type of browser and operating system you use; the date and time you access the Online Services; the address of websites you visit prior to or after visiting our Online Services; the number of times you access our Online Services; the pages viewed and features you access during your visit to our Online Services; responses to advertisements and promotions on the Online Services, other websites, and mobile applications; Transamerica emails you open and links you click within those emails; data regarding your internet service provider or mobile carrier geolocation data (to the extent provided by you or your device); data and/or information from mobile or wearable devices; inferences which we may gather relating to your preferences, attitudes, characteristics, or behaviors; and the type of handheld or mobile device that you use.

**Information from Other Sources.** We may collect information about you from third-party sources, including from commercially available sources such as credit reporting agencies, data brokers or other companies that collect or analyze information about consumers or users. Examples of information we receive from third-party sources include: (1) credit history information from credit bureaus, which we use to help prevent and detect fraud and to offer certain credit or financial services to certain customers; (2) demographic information from data brokers and other sources to help anticipate consumer trends and needs; (3) information provided from sources you have authorized to share information with us, either on our Online Services or via third-party applications, devices, websites, or other digital interfaces; and (4) other similar types of information. We may also gather information from other third parties with their own privacy practices and policies. We may combine information obtained from other sources with information we collect ourselves.
How We Use the Information We Collect

For example, we may use information we collect to operate our business, including the following:

• for our everyday business purposes, such as establishing and administering Products, providing information you request and providing customer support;
• to evaluate your eligibility for Products;
• for special events, programs, surveys, contests, sweepstakes and other offers or promotions, some of which may have additional rules or provisions addressing how your information is used or shared;
• to price and develop new and existing Products or technology and analyze the effectiveness of Products, marketing trends, mobile applications and websites;
• to maintain the quality or safety of Products or technology which we may own, control or provide;
• to conduct internal research;
• to deliver content and marketing communications that we think may interest you, including ads or offers tailored to you based upon your browsing and usage history, both within these Online Services and on other websites and mobile applications;
• to provide retirement calculators, assessments and other financial planning tools on the Online Services;
• to comply with the law, regulations and other legal obligations;
• to properly verify your identity, prevent fraud and enhance security;
• to audit and provide reporting relating to particular transactions and interactions, including online interactions you may have with us or others on our behalf;
• to allow you to utilize features and personalized content within our Online Services when you grant us access to information from your device (e.g., contact lists, geolocation, etc.), including location-based services;
• to contact you, including via telephone, text or chat;
• for short-term, transient use including contextual customization of ads;
• to protect our rights and the rights of others; and/or
• for other purposes, as permitted by law or to which you consent.

Information Sharing and Disclosure

For example, we may share the information that we collect about you to support our business, including the following:

Affiliates and Service Providers. We may share information with our corporate entities and affiliates, service providers, data processors, third-party contractors, payment processors and others who perform services for us in connection with our Online Services or our businesses, to complete or confirm a transaction or series of transactions or to provide Products or services to you (e.g., your employer or plan sponsor, reinsurers, health care professionals, credit agencies, or your representatives). In some cases, as permitted by law, we may share information with our affiliates to market their products and services to you.

Other Entities. We may share information as part of a merger, acquisition or other sale or transfer of all or part of our assets or business. To the extent you apply for a Product online, we may share your information with all the entities you have authorized us to share information with or request information from in the application (e.g., your employer or plan sponsor, reinsurers, health care professionals, credit agencies, your representatives, etc.).

Government Entities, Regulators, and Law Enforcement. We may disclose information about you to third parties under certain circumstances, such as in connection with illegal activity performed by a user on
the Online Services, or to respond to a subpoena, court order or other legal process. We may release information that we collect to law enforcement, government officials, insurance regulators, auditors, professional advisors, or third parties as required or permitted by law, to protect our rights and the rights of others, or in our discretion to prevent fraud, harm, or loss to you, ourselves, or others.

**Social Media.** We may include widgets, tool bars, or icons from social media providers on our Online Services that allow you to interact or share information with them, and these social media networks may collect information about your browsing on the pages of our Online Services. Such collection may occur where the widgets, tool bars, or icons are visible, even when you do not click on or otherwise activate the widgets, tool bars, or icons. The privacy policy of the relevant social media network controls the collection, use and disclosure of all information collected by that social media network.

**Marketing, Analytics, and Advertising Partners.** Third parties may collect personally identifiable information about your online activities over time and across different Websites when you use our Online Services. We may share information with marketing providers, analytics providers, and Advertising Partners. “Advertising Partners” means advertising networks which deliver targeted advertisements to consumers, including advertisements with links to Transamerica websites, and which generate related statistics and metrics. These Advertising Partners may utilize information collected through a variety of Data Technologies to provide advertising placement, customization, auditing, research and reporting for us and other advertisers. Notwithstanding the foregoing, we will not share text messaging originator opt-in data and consent information with any Advertising Partners.

**Your Communication Choices**

You may make certain choices about how we communicate with you. For example, you may: elect not to provide your information; adjust your device or browsing settings to disable, prohibit or turn off Data Technologies or geolocation or location services features; and adjust your device’s settings regarding the use of advertising identifiers. (Please note that when you adjust settings or delete Data Technologies in one device or browser, those same settings or deletions may not be effective on other, different devices or browsers.) As of the effective date above, we do not respond to Do Not Track signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party websites. If you choose to limit collection of your information in these ways, certain Online Service features may not function properly, or at all, and certain Products may not be available to you.

If you do not want to receive marketing emails from us, you can follow the unsubscribe link provided in those emails.

**Your Privacy Rights**

**Accessing Your Information.** If you created an online account, you can log in to that account to access all or some of the information you previously provided.

**Correcting Your Information.** If you believe that information we maintain about you is inaccurate, subject to applicable law you may request that we correct or amend the information by contacting us as indicated in the **Contact Us** section below. In many cases, you may also access your online account to correct your information.

**Consumer Requests.** Under certain privacy laws, you may have the right to make requests regarding your information (“Consumer Request(s)”). If you have questions about Consumer Requests, please call our toll-free number 877-247-2401, or contact us by email at consumerdatarequest@transamerica.com.
**Additional Privacy Notices**

Additional privacy rights may be available to you. The following additional notices may provide more information regarding your privacy rights if you use or have applied for Products or services subject to these notices:

**HIPAA Notice of Privacy Practices** – This notice applies to certain health plan Products (or other Products covered by the Health Insurance Portability and Accountability Act (“HIPAA”)) with Transamerica Financial Life Insurance Company or Transamerica Life Insurance Company, such as Dental, Long Term Care, Medicare Supplement, Prescription Drug Coverage, Supplemental Medical Expense, Medical Expense and TRICARE.

**Notice of Privacy Practices** (Insurance) – This notice applies to certain insurance or other financial Products offered by Transamerica (but not including health plan Products), such as our life insurance and annuities Products.

**Notice of Privacy Practices** (Retirement) – This notice may apply if you have a product or account serviced by a Transamerica retirement company (such as a 401k, 403b, or other retirement-related account supported by your pension plan or employer), or other financial Products offered by a Transamerica retirement company.

**California Consumer Privacy Act Consumer Disclosure** – If you are a California resident, you have certain additional privacy rights such as the right to request that we delete your personal information. For example, under the California Consumer Privacy Act (“CCPA”), California residents may request to prohibit the “sale” of their personal information, as defined in the CCPA. If you are a California resident and wish to make a do not sell my personal information request, please click here.

**Other Products** - For Products pursuant to which Transamerica administers health-related, benefit or other financial accounts, such as health savings accounts (HSAs), flexible spending accounts (FSAs), or health reimbursement arrangements (HRAs), on behalf of your employer, the privacy notices of your employer or financial institution may also apply. If you are interested in obtaining a copy of a privacy notice associated with Products offered through a specific employer or group, please contact the individual at your company or workplace who manages your Transamerica plans and benefits.

**Children’s Privacy Rights**

Our Online Services are not directed to children under the age of 13.

**Security**

We use administrative, technical, and physical security measures designed to safeguard your information against loss, theft, unauthorized use, disclosure, or modification. Of course, despite these measures, no network or system is entirely secure, and we cannot guarantee the security of networks and systems we operate or that are operated on our behalf.

**Contact Us**

If you have any questions or comments about this Statement, please contact us by email at Privacy@transamerica.com. You may also contact us at the number listed on your Product statement to request any unique privacy notice associated with that Product.