

## Agent Notice at Collection and Privacy Policy for California Residents

**Effective and last updated:** April 21, 2023

Sentinel Security Life Insurance Company and its affiliates and subsidiaries (“we,” “us,” and “our”) collect and use Personal Information from agents for our business purposes. This Agent Privacy Policy for California Residents (the “Policy”) applies only to personal information that we collect about or from individuals who reside in California acting as insurance agents (“California Agent Personal Information”). This [Policy](#) includes information regarding the categories of [California Personal Information](#) to be collected, the [purposes](#) for which the categories of California Personal Information are collected or used, whether California Personal Information is sold or [shared](#), and how long the California Personal Information is [retained](#). You can find those details by clicking on the link provided above.

California Agent Personal Information does not include, and this Policy does not apply to, information that is not subject to the California Consumer Privacy Act of 2018 as amended from time to time (“CCPA”), such as deidentified information.

Additionally, this Policy applies only to the extent we direct the purposes and means of California Agent Personal Information processing and otherwise qualify as a business under the CCPA. This Policy also may not apply to California Agent Personal Information we process for purposes of compliance with federal, state, or local laws or court orders or subpoenas.

### A. California Agent Personal Information We Collect

We may collect, and may have collected in the preceding 12 months, the below categories of California Agent Personal Information. Certain data elements appear in multiple categories in accordance with CCPA descriptions of those categories and data elements.

- **Identifiers**, such as full name, telephone numbers, email addresses, Social Security number, other government identification numbers, such as tax identification numbers.
- **Unique and online identifiers**, such as device identifiers, internet protocol addresses, cookie identifiers, beacon identifiers, pixel tags or mobile ad identifiers or similar technology, or other forms of persistent or probabilistic identifiers that can be used to identify a particular person or device.
- **Commercial information**, such as records of products or services purchased, obtained, or considered.
- **Professional and employment-related information**, such as employer or organization name, professional license and qualification information, and job title.
- **Audio, electronic, and similar sensory information**, such as voicemail recordings.

- **Categories of personal information described in California Civil Code § 1798.80**, such as such as name, Social Security number, telephone number, passport number, and tax identification and other government identification numbers.
- **Internet or other electronic network activity information**, such as browsing history, login information, and IP addresses.
- **Geolocation data**, such as IP address.
- **California Agent Personal Information the CCPA defines as “sensitive”**, such as information revealing Social Security and driver’s license numbers, an account log-in in combination with required passwords and credentials allowing access to your account with us, and information revealing financial account numbers.

We will retain the personal information we collect and process for as long as required to satisfy the purpose for which it is collected and used (for example, for the time necessary for us to process applications, deliver, manage, and administer policies and claims, answer queries, or resolve technical problems), unless a longer period is required or permitted by law, such as to fulfill our legal obligations or to establish, protect or defend legal claims.

B. Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information

We may use, disclose, or otherwise process California Agent Personal Information for purposes including:

- Providing our services, websites, and products, such as by processing applications and delivering managing, and administering policies and claims, to you and others.
- Administering our relationship with you, including performing background checks.
- Operating, evaluating, and improving our organization.
- Understanding how you and others, including our business customers, use our services and websites and to determine what features and services may interest you and others.
- To update or modify features of our services, websites, and products.
- To communicate with you and others, including to provide updates and bulletins regarding our products and services.
- To respond to requests.
- For marketing purposes.
- Storing information about your preferences, recognizing you when you use our websites, and customizing your experience.
- To create aggregate or deidentified data.
- Determining your location.

- To maintain the safety, security, and integrity of our websites, other technology assets, services, and our organization.
- Protecting the legal rights, property, safety, and security of us, our users, our employees, and others.
- Complying with applicable law, other legal requirements, and industry standards.
- To protect against malicious, deceptive, fraudulent, or illegal activity, and participating in any prosecution or enforcement of laws or agreements meant to prevent or punish such activity.
- To debug, identify and repair errors, or effectuate similar functional enhancements in connection with our websites or other services.
- Enforcing our policies, terms of use, contracts, or other legal rights.
- To evaluate an actual or potential merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, including as part of bankruptcy, liquidation, or similar proceedings.
- For such other purposes we may disclose or as you may authorize.

Notwithstanding the foregoing, we do not intend to use, disclose, or otherwise process California Agent Personal Information the CCPA defines as “sensitive” for the purposes of inferring characteristics about you.

#### C. Sources of California Agent Personal Information

We may collect or receive California Agent Personal Information:

- Directly from you;
- Automatically and indirectly from you, such as through logging and analytics tools, cookies, pixel tags, and other similar technologies on our websites and information technology systems and equipment; and
- From third parties, such as our or your service providers and business partners.

#### D. Disclosures of California Agent Personal Information for a Business Purpose

In the preceding 12 months, we may have disclosed the categories of California Agent Personal Information listed below to the categories of third parties identified below for a business purpose:

- **Identifiers**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **Unique and online identifiers**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **Commercial information**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using,

Disclosing, and Otherwise Processing California Agent Personal Information” section above.

- **Professional and employment-related information**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **Audio, electronic, and similar sensory information**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **Categories of personal information described in California Civil Code § 1798.80**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **Internet or other electronic network activity information**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **Geolocation data**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **Sensory or surveillance information**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.
- **California Agent Personal Information the CCPA defines as “sensitive”**—to our affiliates, service providers, and other third parties as necessary for the purposes described in the “Purposes for Using, Disclosing, and Otherwise Processing California Agent Personal Information” section above.

E. Sales and Sharing of California Agent Personal Information for Cross-context Behavioral Advertising

In the preceding 12 months, we have not sold California Agent Personal Information or shared California Agent Personal Information for cross-context behavioral advertising. We do not sell California Agent Personal Information or share California Agent Personal Information for cross-context behavioral advertising, and we do not have actual knowledge that we sell California Agent Personal Information or share California Agent Personal Information for cross-context behavioral advertising of consumers under 16 years of age.

F. California Agent Personal Information Rights and Choices

The CCPA provides consumers with specific rights regarding their California Agent Personal Information. This section describes those rights and explains how to exercise them.

- Right to Access to Specific Information. You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your California Agent Personal Information over the past 12 months. If we receive and confirm a verifiable consumer request from you pursuant to the “Exercising Rights” section below, we will disclose to you, depending on the scope of the request:
  - The categories of California Agent Personal Information we collected about you.
  - The categories of sources for the California Agent Personal Information we collected about you.
  - Our business or commercial purpose for collecting California Agent Personal Information about you.
  - The categories of third parties to whom we disclose your California Agent Personal Information.
  - The specific pieces of California Agent Personal Information we collected about you.
  - If we disclosed your California Agent Personal Information for a business purpose, a list of the categories of third parties to whom we disclosed California Agent Personal Information for a business purpose identifying the categories of California Agent Personal Information disclosed to those parties in the preceding 12 months.
- Right to Data Portability. You may request obtain a copy of your Personal Information in a portable and, if technically feasible, readily-usable format that allows you to transmit the Personal Information to another person or entity without hindrance.
- Right to Deletion. You may request that we delete your Personal Information, subject to certain exceptions.
- Right to Correction. You may request that we correct California Agent Personal Information about you that is inaccurate. We will take into account the nature of the California Agent Personal Information and the purposes of our processing when we address your request.
- Exercising Rights. To exercise the rights described above, please submit a verifiable consumer request by either:
  - Calling (888) 927-1727; or
  - Completing our webform at [SSL CCPA Rights Request Form.pdf](#)

Only you, or an agent that you authorize to act on your behalf, may make a verifiable consumer request related to your California Agent Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Your request must provide information sufficient to verify you are the person about whom we collected California Agent Personal Information. In order to verify your request, we may ask you to provide information such as your first and last name, address, email address, phone

number, and any other information necessary to verify your identity. Your request must also include sufficient detail for us to properly understand, evaluate, and respond to it.

You may designate an authorized agent to submit requests on your behalf through a valid power of attorney in certain circumstances or through signed written permission that authorizes the agent to act on your behalf. We may require additional information when requests are submitted through an authorized agent, such as requiring the submission of signed written permission for the agent to act on your behalf, requiring you to verify your identity directly with us, and requiring you to confirm the authorized agent's permission to act on your behalf directly.

We cannot respond to a request or provide you with California Agent Personal Information if we cannot verify your identity or authority to make the request and confirm the California Agent Personal Information relates to you. If we cannot fulfill, or are permitted to decline, your request then we will alert you or your authorized representative.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision. We reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request if it is excessive, repetitive, or manifestly unfounded.

- Non-Discrimination. Subject to certain exceptions, you have a right to not receive discriminatory treatment for exercising your rights as described above.

#### G. Changes to this Policy

We may update this Policy to reflect changes in our privacy practices at any time and without prior notice to you. When we do so, we will update the effective and last updated date above. We encourage you to periodically review this Policy for the latest information on our privacy practices.

#### H. Contact Information

If you have any questions or comments about this Policy or our privacy practices, please contact us by emailing [privacy@sslco.com](mailto:privacy@sslco.com) or by mail to:

Sentinel Security Life Insurance Company  
ATTN: Privacy Policy  
257 East 200 South, Suite 725  
Salt Lake City, UT 84111