



Privacy Notice for California Residents

(Effective January 1, 2020)

The California Consumer Privacy Act of 2018 (CCPA) gives California residents certain privacy rights with respect to some of the personal information Delaware Life Insurance Company (Delaware Life, or “we”) may collect about you. These rights include:

- The right to receive a notice of the personal information we collect.
- The right to know the categories, sources and specific pieces of personal information we have collected about you in the past 12 months, including our purpose for collecting the information and the categories of third parties with whom we share that personal information, subject to certain exceptions.
- The right to delete some or all of the personal information we collect, subject to certain exceptions.
- The right to opt-out of our sale of your personal information, if we sell your personal information.

We will not discriminate against you if you choose to exercise any of your privacy rights listed above.

CCPA rights are limited and do not apply to personal information collected from you and about you in connection with providing you an insurance or financial product or service. CCPA rights also do not apply to personal information we may collect that is covered under the federal Gramm-Leach-Bliley Act or the California Financial Information Privacy Act.

The types of personal information that may be subject to the CCPA include, but are not limited to:

- personal identifiers (such as your name, social security number, address, bank accounts, credit cards; medical and health information; including your claims history);
- sensitive information protected by law (such as your age, gender, disability, race, religion, marital status, source of income and genetic information);
- biometric information (such as your fingerprint and photos for facial recognition);
- internet and network activity (such as your browsing history and interactions with our website);
- geolocation;
- voiceprints;
- your job history; and
- your education history and inferences drawn about you from this information, such as your preferences, aptitudes and abilities.

We do not sell your personal information.

We use the personal information we collect to help us provide the products and services you have requested and to maintain and service your accounts. Once we obtain personal information from you, we do not disclose it to any third party except as permitted or required by law.

We may share your personal information within Delaware Life to help us develop innovative financial products and services. Delaware Life provides a wide variety of financial products and services including individual life insurance, and individual fixed and variable annuities.

We also may disclose your personal information to companies that help in conducting our business or perform services on our behalf. These companies may use and disclose the information provided to them only for the purpose for which it is provided, as permitted by law.

There also may be times when Delaware Life is required to disclose its customers’ nonpublic personal information, such as when complying with federal, state or local laws, when responding to a subpoena, or when complying with an inquiry by a governmental agency or regulator.

If you wish to obtain a more detailed explanation of your rights under the CCPA, please call our customer service team or email privacy@delawarelife.com.

Delaware Life Insurance Company (Waltham, MA) is authorized to transact business in all states (except New York), the District of Columbia, Puerto Rico, and the U.S. Virgin Islands and is a member of Group One Thousand One, LLC (Group1001).

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California Consumer Privacy Act (CCPA) FAQ

A privacy notice for **California residents only** has been added to the Delaware Life public website (a copy is attached).

Below is information you might find helpful in the event you have any questions concerning this Privacy Notice. Please feel free to direct questions to the Company's Privacy Officer using the dedicated privacy mailbox: privacy@delawarelife.com

What is CCPA? The California Consumer Privacy Act of 2018 is a law that impacts the collection and processing of personal information (PI) of **California** consumers. CCPA went into effect on January 1, 2020.

What does CCPA require Delaware Life to do? CCPA requires Delaware Life to create a way for eligible California residents to exercise their rights under the law, and to ensure Delaware Life provides the required information. These rights include:

Right to notice: the right to be informed about collection, disclosure, and sale of their personal information, including: the personal information collected; the categories of personal information disclosed or sold; the categories of sources of personal information and categories of third parties to whom that information is sold or disclosed; the purpose of collecting or selling personal information; and a description of the consumer's rights.

Delaware Life only collects information that has been provided to us by customers who inquire about our products or who have an active or closed account with us. We DO NOT sell customer information.

Right to access: the right to request the specific pieces of personal information Delaware Life has collected about them; the categories of personal information we collected; the sources used to collect the personal information ; the business or commercial purposes for collecting that information ; and the categories of third parties with whom we share their personal information. This right pertains to information collected within the 12-month period prior to submitting a request.

Right to delete: the right to request that Delaware Life delete the personal information that we collected from them.

This right is limited by state and federal data retention requirements.

Right to Equal Service and Price: the right not to be discriminated against for exercising any of these rights.

Please review the Delaware Life California Consumer Privacy Act (CCPA) Notice for additional details (<https://www.delawarelife.com/shortcut/PrivacyPolicyCA>).

Am I covered by CCPA? You are covered by CCPA if you are a **California resident** and are not excluded based on your existing relationship with us.

I'm a representative of a business that has a relationship with Delaware Life. Can I exercise rights under the CCPA? Yes, but personal information related to your business relationship is considered exempt from the CCPA and will not be included in your CCPA response.

I'm a current or former Delaware Life customer. Can I exercise rights under the CCPA? Customers include individuals with current relationships with us as well as those who applied for but were denied financial products or services offered by Delaware Life. Personal information collected, processed, or disclosed in connection with our customer relationships is exempt from the CCPA.

If you are a former customer, you may submit a request. However, your personal information is regulated by other state and federal laws that may require Delaware Life to retain your information even if your contract/policy has been closed.

Can I still send a request if I'm not a customer? If you are a California resident, you may send us a CCPA request. The CCPA does not require you to be a Delaware Life customer to make a request.

I'm not in California but I do have a residence there. Can I still request what personal information you have about me? Yes, you may send in a request if you use your California address when completing your CCPA request. Keep in mind that if this is not an address you regularly use, it may be harder for us to verify your identity or match personal information we have about you with your request.

Submitting your CCPA request

How do I send in a CCPA request? Email your request to privacy@delawarelife.com or by phone using the appropriate number found on our contact page at www.delawarelife.com/contact-us.

What information is needed from me to send a CCPA request? We need to verify your identity to protect your personal information, as well as that of others. When we verify who you are, we are ensuring that the person making the request is authorized to do so. You will need to provide us with your name, address, phone number, email, date of birth and the last 4 digits of your Social Security number.

What happens after I send in a CCPA request? Once we have your completed request, you will be contacted to confirm your request was received. We will send you a response within 45 days.

What personal information of mine will you keep as a result of my CCPA request? We will maintain your name, address, email and phone number for 13 months as evidence that we received your request and acted on it.

How long does it take to receive my CCPA response? You may expect to hear from us within 45 days after you submitted your initial request. In some instances, the first response you receive from us may be a notification that your response is delayed for up to an additional 45 days. This may happen if we are unable to locate sufficient information without additional research.

How do I receive my CCPA Response? You will receive a CCPA response either electronically or by U.S. mail.

I didn't get what I expected in my CCPA response. Can I make another request? If you received your response to a request and you do not believe that it is complete, you may send a follow-up request. You should include in that request the reason(s) you believe the response was incomplete. Keep in mind that we only retain consumer information for a certain period of time, so we may no longer have your information at the time you request it.

Why was my CCPA request declined? Our response to your request should tell you why your request was denied. There are several reasons why your request might have been declined, including the following:

If you are not a California resident, you are not covered by CCPA.

If you are an existing Delaware Life customer, you already have access to your personal information. The information we maintain on file is information provided by you during the application process and throughout the life of your policy/contract. You also receive a privacy notice each year, which contains details about the personal information we collect.

We previously collected data, but we no longer have your information at the time of your request.

I don't understand the response to my CCPA request. How can I ask questions? You may send in a follow-up request to clarify questions from your original request. Please review this complete list of FAQs to see if they can answer any of your questions.

I sent in a request to access my information, now I'd like to request to delete it. How do I do that? You may send in another request and ask that your information be deleted. Keep in mind if you are a current customer, we are required to maintain your information to service your account. This information is excluded from the CCPA.

My CCPA response stated that you were unable to verify my identity. What does that mean? We may not have been able to verify your identity for several reasons: The information you provided for verification did not match what we have on file, or we did not have enough information in our files to make a match.

How does Delaware Life keep my information safe? We use reasonable physical, electronic, and procedural safeguards to protect and limit access to your personal information. This includes device safeguards and secured files and buildings. For more details about how we protect your personal information go to: www.delawarelife.com/privacy.

What does Delaware Life do with my personal information? We use your personal information to verify your identity, and to respond to a request you have made. We may also need to use your personal information to comply with our legal requirements, industry standards, or contractual obligations. Please find a full description of our privacy policy at www.delawarelife.com/privacy.