



Pacific Guardian Life Privacy Policy

Pacific Guardian Life (“We”) knows that the privacy of your personal information is important to you. That is why we want you to understand what information we collect and how we use it.

We collect and use your personal information to provide you with a broad range of financial products and services as effectively and conveniently as possible. We use the term “personal information” to describe information that can reasonably be associated with you and can be used to identify you. Personal information does not include information that has been de-identified or aggregated.

Applicability

This Privacy Policy (“Policy”) applies to personal information we collect through our website (the “Site”), as well as to personal information we collect by other means, whether online or offline.

This Policy does not apply to the personal information we collect from you that is already protected under such laws as Gramm-Leach-Bliley Act (GLBA) and California Financial Information Protection Act.

Information We Collect

We collect personal information from the following sources:

- Consumer reporting agencies
- Directly from you
- Indirectly from your interactions with our technologies or the Site
- Medical providers
- Other service providers
- Our sales force
- Public records

We collect the following categories of personal information about our prospective and current customers:

- Educational information, including school(s) attended, dates attended, degree(s) earned, and academic achievements.
- IP address, cookies, and data concerning interaction with the Site.
- Personal identifiers, including name, date of birth, age, home address, and citizenship.
- Professional or employment information, including employment history, and professional designations.
- Profile information, including profiles reflecting a person's preferences, such as interests, hobbies, characteristic tendencies, behaviors, attitudes, or aptitudes.

We collect the following categories of sensitive personal information about our prospective and current customers:

- Demographic information, including race, ethnicity, gender identification, disability status.
- Financial information, including bank account information, investment or brokerage accounts, information regarding estate or tax planning, debts, and trusts.
- Medical information, including medical history, medical questionnaires, information regarding physical, mental, and behavioral health, information regarding payment for health care services.
- Government identifiers, including driver's license, passport number, and Social Security number.

How We Use the Personal Information We Collect

We may use the personal (including sensitive) information we collect from our prospective and current customers for one or more of the following business or commercial purposes:

- Analytics
- Conducting audits
- Debugging
- Detecting and protecting against security incidents
- Marketing and advertising our company and its products and services
- Meeting legal, regulatory, and compliance requirements
- Providing services (including insurance services) to you
- Strategic development

How We Share or Sell Personal Information

We do not share or sell your personal information.

We may, however, disclose your personal (including sensitive) information to third parties for business or commercial purposes. Examples of such third parties include:

- Attorneys and other legal professionals
- Consultants and contractors (e.g., external auditors)
- Financial services professionals
- Software as a service provider

We may also disclose information about you with outside companies, organizations, or individuals if we have a good-faith belief that access, use, preservation, or disclosures of the information is reasonably necessary to: meet any applicable law, regulation, legal process or enforceable governmental request; detect, prevent, or otherwise address fraud, security or technical issues; protect against harm to the rights, property, or safety of our business, our users, or the public as required or permitted by law; and enforce our rights.

In the preceding twelve (12) months, we have not sold any personal information as defined by the California Consumer Privacy Act ("CCPA"). This includes personal information of minors under 16 years of age.

How We Retain Personal Information We Collect

Personal information is retained based on its content, purpose, and applicable laws and regulations. The retention period for a particular record may be extended due to possible or impending litigation.

How We Configure Our Site

Our Site does not currently respond to "Do Not Track" or similar browser signals and does not authorize the collection of personally identifiable information by third parties or sharing of personally identifiable information with third parties except as provided in this Policy.

California Resident Rights

Under CCPA and California Privacy Rights Act ("CPRA"), California residents have certain rights, as follows:

- *Limit Use of Sensitive Personal Information Collected*
California residents have the right to limit the use of sensitive personal information to perform services or provide goods. Since we only use sensitive personal information to provide services that you requested, to fulfill contracts with you, and/or to comply with legal obligations, the ability to limit the use of sensitive personal information is not applicable.

- *Opt-Out of the Sale of Personal Information*
California residents have the right to opt-out of the sale of their personal information. Since we do not sell personal information, the ability to opt-out is not applicable.
- *Know What Personal Information is Shared or Sold*
California residents have the right to request that we disclose certain information to you about our sharing or selling of personal information. Since we do not share or sell your personal information, the ability to request this information is not applicable.
- *Know What Personal Information is Collected*
California residents have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and verify your consumer request, we will disclose a list of categories of personal information collected about you and the categories of sources from which the personal information was collected. Unless an exception applies, the following will be disclosed:
 - Categories of personal information we collected about you.
 - Categories of sources from which personal information was collected about you.
 - Business or commercial purpose for collecting or selling your personal information.
 - Categories of third parties with whom we shared your personal information.
 - Specific pieces of personal information we collected about you.
- *Delete Personal Information*
California residents have the right to request that we delete your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and verify your consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.
- *Correct Personal Information*
California residents have the right to correct personal information. Once we receive and verify your consumer request, we will correct (and direct our service providers to correct) your personal information.

To verify your identity, we will match information you provide to us with the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to exercise the right to know, delete, or correct, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know, delete, or correct, particularly where we are unable to verify your identity.

To exercise your rights under the CCPA and CPRA, please submit a request to us by one of the following methods:

- Calling us at 1-800-367-5354; or
- Online at <https://www.pacificguardian.com/privacy-policy/data-request>

If you have an authorized agent, that person also may submit requests relating to your CCPA or CPRA rights. We will need to verify the agent's identity and their authority to act on your behalf.

We will not discriminate against you for exercising any of these privacy rights described above.

We allow consumers or their authorized agents to submit requests to know or to delete up to two times within a 12-month period.

Changes to Our Privacy Policy

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will update the Site and the Policy's last revised date accordingly. Your use of the Site and/or our services constitutes your consent to the terms of this Policy. If you cannot or do not consent to the terms of this Policy (as it may be revised from time to time), you must not use the Site.

Contact Information

If you have any questions or comments about this Policy, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please contact us at 1-800-367-5354 or privacy@pacificguardian.com.