

## CCPA PRIVACY POLICY FOR CALIFORNIA RESIDENTS

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws in the United States, and we are responsible as “controller” of that personal information for the purposes of those laws.

**1. Key Terms.** It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Landmark Life Insurance Company
Personal information	Any information relating to an identified or identifiable individual

**2. Personal Information We Collect About You.** We may collect and use the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers)	Name, address, social security number, telephone number.

<p>Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>	<p>Name, signature, social security number, address, bank account number, financial institution information, doctor's name, prescriptions, health information.</p>
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This personal information is required to provide products and/or services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products and/or services to you.

**3. How Your Personal Information is Collected.** We collect most of this personal information directly from you—in person, by telephone, or email. However, we may also collect information:

- From publicly accessible sources (e.g., property records);
- Directly from a third party (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
- From a third party with your consent (e.g., your bank).

**4. How and Why We Use Your Personal Information.** Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
To provide products and/or services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Landmark Life Insurance Company	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
<p>Conducting checks to identify our customers and verify their identity</p> <p>Screening for financial and other sanctions</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. regulation or rules issued by our professional regulator</p>	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g. in relation to customer base and efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you  To comply with our legal and regulatory obligations
Updating customer records	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party
Statutory returns	To comply with our legal and regulatory obligations
External audits and quality checks	For our legitimate interests or a those of a third party.  To comply with our legal and regulatory obligations

[The above table does not apply to special category personal information, which we will only process with your explicit consent.]

**5. Promotional Communications.** We may use your personal information to send you updates about our products.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organizations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at:  
Policyholder Services  
P.O. Box 40  
Brownwood, Texas 76804

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products in the future, or if there are changes in the law, regulation, or the structure of our business.

**6. Who We Share Your Personal Information With.** We routinely share personal information with:

- Service providers we use to help deliver our products and/or services to you;
- Other third parties we use to help us run our business, such as marketing agencies or website hosts;
- Third parties approved by you, including third-party payment providers;
- Our insurers and brokers;
- Our banks.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

**7. Personal Information Disclosed for a Business Purpose.** In the preceding 12 months, we have disclosed for a business purpose to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers); and
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

**8. Where Your Personal Information is Held.** Information may be held at our offices, third party agencies, service providers, representatives and agents as described above (see above: “Who We Share Your Personal Information with”).

**9. How Long Your Personal Information Will Be Kept.** We will keep your personal information while you have an account with us or while we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

**10. Your Rights Under the CCPA.** You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know:</p> <ul style="list-style-type: none"> <li>• The categories of personal information we have collected about you;</li> <li>• The categories of sources from which the personal information is collected;</li> <li>• Our business or commercial purpose for collecting or selling personal information;</li> <li>• The categories of third parties with whom we share personal information, if any; and</li> <li>• The specific pieces of personal information we have collected about you.</li> <li>• Please note that we are not required to:</li> <li>• Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary</li> </ul>
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	<p>course of business, that information about you is not retained;</p> <ul style="list-style-type: none"> <li>• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or</li> <li>• Provide the personal information to you more than twice in a 12-month period.</li> </ul>
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any personal information we may disclose to a third party for a business purpose, you have the right to know:</p> <p>The categories of personal information that we disclosed about you for a business purpose.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> <li>• Delete your personal information from our records; and</li> <li>• Direct any service providers to delete your personal information from their records.</li> <li>• Please note that we may not delete your personal information if it is necessary to:</li> <li>• Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;</li> <li>• Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or</li> </ul>

	<p>prosecute those responsible for that activity;</p> <ul style="list-style-type: none"> <li>• Debug to identify and repair errors that impair existing intended functionality;</li> <li>• Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;</li> <li>• Comply with the California Electronic Communications Privacy Act;</li> <li>• Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;</li> <li>• Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;</li> <li>• Comply with an existing legal obligation; or</li> <li>• Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.</li> </ul>
<p>Protection Against Discrimination</p>	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> <li>• Deny goods or services to you;</li> </ul>

	<ul style="list-style-type: none"> <li>• Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;</li> <li>• Provide a different level or quality of goods or services to you; or</li> <li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.</li> </ul> <p>Please note that we may charge a different price or rate or provide a different level or quality of [goods and/or services] to you, if that difference is reasonably related to the value provided to our business by your personal information.</p>
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**11. Keeping Your Personal Information Secure.** We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

**12. How to Exercise Your Rights.** If you would like to exercise any of your rights as described in this Privacy Policy, please:

- Call us, toll-free, at 1-800-299-5433;
- Submit a request at [www.landmarklife.com/contact-us/](http://www.landmarklife.com/contact-us/); or
- Write to us at Policy Holder Services, P.O. Box 40, Brownwood, TX 76804

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by phone or in writing, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person’s behalf.

Any personal information we collect from you to verify your identity in connection with you request will be used solely for the purposes of verification.

**13. Changes to This Privacy Notice.** This privacy notice was published on January 1, 2020 and last updated on the same date.

We may change this privacy notice from time to time—when we do, we will inform you via mail.

**14. How to Contact Us.** Please contact us by mail, email or telephone if you have any questions about this privacy policy or the information, we hold about you.

Our contact details are shown below:

Our contact details
P.O. Box 40, Brownwood, Texas 76804
connect@life-insurers.com
1-800-299-5433
www.landmarklife.com

**15. Do You Need Extra Help?** If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact us” above).