



Group Products  
Underwritten by Dearborn Life Insurance Company

## **Privacy Notice for California Consumers**

**1/1/2020**

This **Privacy Notice for California Residents** applies to California Residents whose data is subject to the California Consumer Privacy Act of 2018 (CCPA). Below describes what information Dearborn Life Insurance Company (DLIC) collects that is subject to the CCPA, your rights under the CCPA, and how you can exercise those rights. Any terms defined in the CCPA have the same meaning when used here.

### **Information We Collect**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer ("Personal Information").

Personal Information does not include, for example:

- Publicly available information from government records.
- De-identified or aggregated consumer information
- Information excluded from the CCPA's scope, such as:
  - o health or medical information covered by the Health Insurance Portability and Accountability act of 1996 (HIPAA);
  - o personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA) and the Gramm-Leach-Bliley Act (GLBA).

If certain types of information are exempt from CCPA, this policy would not apply, but other privacy policies may apply such as our HIPAA Notice of Privacy Practices. Further, depending on your relationship with us, for example, if you are an employee or a vendor of ours, certain of the below rights may not apply.

We may collect and may have collected the following categories of Personal Information from its consumers within the last twelve (12) months:

- A. Identifiers, such as, name, contact information, online identifiers, and government-issued ID numbers.
- B. Personal information, as defined in the California customer records law, such as name, contact information, payment card data, medical information, insurance information, and financial information.

- C. Characteristics of protected classifications under California or federal law, such as age and medical conditions.
- D. Commercial information, such as, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- E. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- F. Geolocation data, such as device location.
- G. Professional or employment related information, such as current or past job history or performance evaluations.

We generally do not collect additional categories of Personal Information or use the Personal Information we collected for significantly different or meaningfully unrelated purposes without providing you notice.

### **Where We Obtain Personal Information**

We may obtain the categories of personal information listed above from the following categories of sources:

- Directly from you.
- Third Parties. For example, our affiliates or third-party vendors.

### **Use of Personal Information**

We may use, or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our services, or news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including billing.
- To improve our website and present its contents to you.
- For testing, research, analysis, and product development.
- As necessary or appropriate to protect the rights, property, or safety of us and our employees, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

- In the event of mergers and acquisition activity and transferred as a business asset.

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purposes except performing the contract. In the preceding twelve (12) months, we may have disclosed the above listed categories for a business purpose. We do not sell Personal Information, and in the preceding twelve (12) months, we have not sold personal information. We may disclose deidentified patient information derived from patient information of California consumers that has been deidentified under HIPAA under either the methodology described in Section 164.514(b)(1) of Title 45 of the Code of Federal Regulations, commonly known as the HIPAA expert determination method or the method described in Section 164.514(b)(2) of Title 45 of the Code of Federal Regulations, commonly known as the HIPAA safe harbor method, for a business purpose and/ or relevant Gramm-Leach Bliley and/or applicable state laws. We do not knowingly sell deidentified patient information.

## **Your Rights and Choices**

If you are a California resident, you may request that we:

- Disclose to you the following information covering the 12 months preceding your request:
  - o The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
  - o The specific Personal Information we collected about you;
  - o The business or commercial purpose for collecting (if applicable) Personal Information about you; and,
  - o The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).
- Delete Personal Information we collected from you.

## ***“Verifiable Consumer Request”***

To request to exercise your rights pursuant to the terms of the CCPA, you must submit a “verifiable consumer request.” Only you, or your authorized agent, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

A verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. We will request, for example, the submission of the person’s first and last name, address and date of birth.

If we cannot verify your identity or authority to make the request, we will not be able to fulfill your request.

The information provided for verification will only be used for that purpose.

As stated, the CCPA allows for you to make a request for your personal information and/or have your information deleted. To make a request for the disclosures or deletion described above and/or if you are an authorized agent and would like to make a request on behalf of a California resident, please call 855-649-9648. We will respond to your request consistent with applicable law.

### **Non-Discrimination**

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

### **Contact information**

You can contact us with your questions, comments, rights requests, and other CCPA-related inquiries by contacting the applicable areas below:

DLIC

Attn: Privacy Office

701 E. 22nd Street

Lombard, IL 60148

### **Effective Date**

This Privacy Notice for California Residents is effective 1/1/2020. Certain rights granted by the CCPA will not be effective until 1/1/2023.