

# California Resident Privacy Statement

Last Updated: January 2024

Your privacy is important to us. This California Resident Privacy Statement, as required by the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act ("CPRA") applies to visitors, users, and others (e.g., employees, customers, prospects) who reside in the State of California. The information in this Privacy Statement is provided by Prudential Financial, Inc., its subsidiaries, and affiliates, other than Assurance IQ, LLC. and its own subsidiaries. The Prudential entities providing this Privacy Statement are referred to herein as "we" or "us" and include Prudential Financial, Inc. subsidiaries and affiliates that use the names Prudential, Pruco, PRIAC, and PGIM. This Privacy Statement explains how we collect, use, and disclose Personal Information relating to California residents (referred to herein as "You" and "Your"). To exercise your privacy rights, you may:

- visit us online at our [Prudential Privacy Center](#) or [PGIM Privacy Center](#); or
- call us at: 1-877-248-4019

## What is Personal Information?

Under the CCPA, as amended by CPRA, "Personal Information" is information that identifies, relates to, describes, references, or is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or device. The CCPA, as amended by the CPRA, however, does not apply to certain information, such as information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act ("GLBA") and the Health Insurance Portability and Accountability Act ("HIPAA").

*As a result, this California Resident Privacy Statement does not apply with respect to information that we collect in connection with providing financial products or services to California residents for personal, family, or household purposes or for long-term care or individual health products. For more information about how we collect, disclose, and secure information in these and other contexts, please refer to our [Prudential Privacy Center](#) or the [PGIM Privacy Center](#).*

Personal Information also does not include de-identified or aggregate consumer information (such as demographic-level data or data that can no longer be tied to a single identifiable individual), or information that is publicly available (such as information from public records).

## Our Collection, Use, and Disclosure of Personal Information

We collect Personal Information relating to California residents in a variety of contexts. For example, we collect Personal Information relating to individuals who request or obtain our

products or services for themselves or a business, apply for employment with us, or are our employees, vendors, contractors, or similar personnel, visitors to our locations or facilities, or our shareholders. The specific Personal Information that we collect, use, and disclose relating to a California resident will depend on our relationship or interaction with that individual.

### **Categories of Personal Information Collected**

The Personal Information we collect about California residents includes information within the categories below. These categories are defined by California law and represent the covered categories of Personal Information that we have collected about California residents, and how they have been shared, over the past 12 months. We do not necessarily collect all information listed in a particular category, nor do we collect all categories of information for all individuals.

We collect this Personal Information directly from you and from the following types of sources: publicly available databases, social media platforms, providers of demographic information, credit bureaus, advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, educational institutions, former employers and data brokers.

Categories of Personal Information collected include:

- identifiers including, but not limited to name, postal address, email address, and internet protocols (IP) address;
- Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)); some Personal Information included in this category may overlap with other categories;
- protected classification information under California or federal law;
- commercial Information including, but not limited to transaction and account information;
- biometric Information including, but not limited to fingerprints and voiceprints ;
- internet or other similar activities including, but not limited to browsing history, interactions with our websites (including keystrokes, and mouse clicks);
- geolocation Information including, but not limited to device location;
- sensory data including, but not limited to audio and electronic recording from customer service calls;
- professional or employment-related information including, but not limited to work history, prior employer, and other information necessary for verifying employment eligibility;
- Non-Public Education Information (pursuant to the Family Educational Rights and Privacy Act (20 U.S.C., Section 1232g, 34 C.F.R. Part 99)) including, but not limited to education information such as school, degrees earned, and graduation data;
- inferences drawn from other Personal Information including, but not limited to personal preferences, characteristics, and behavior.

## **Sensitive Personal Information**

We also collect the below categories of Sensitive Personal Information as defined under California law. We generally use Sensitive Personal Information only for the necessary purposes below or as otherwise permitted by law.

Categories of Sensitive Personal Information collected include:

- identifiers including, but not limited to social security, driver's license, state identification card, or passport number;
- account log-in information, financial account, debit card, or credit card number in combination with any required security or access code, password, or similar credentials;
- Personal Information collected and analyzed concerning a consumer's health;
- details about sex life or sexual orientation;
- race or ethnic origin, religious or philosophical beliefs, or union membership;
- citizenship / immigration status.

We generally do not use or disclose your Sensitive Personal Information for purposes other than the following:

- to perform the services or provide goods requested by you;
- to detect security incidents;
- to resist malicious, deceptive, fraudulent, or illegal actions directed at us;
- to ensure the physical safety of natural persons;
- for short-term transient use, including non-personalized advertising;
- to maintain or service accounts, provide customer service, process or fulfill orders and transactions, verify your information, process payments, provide analytic services, or provide storage on our behalf;
- for employment and diversity purposes; and
- to verify or maintain the quality or safety of a service or device owned or controlled by us.

## **Purpose and Use of Personal Information Collected**

The purposes for which we use the Personal Information that we collect depend on our relationship or interaction with a specific California resident. We use Personal Information:

- to operate, manage, and maintain our business;
- to provide our products and services;
- for our employment and vendor management purposes; or
- as directed by the individual the Personal Information is about or with their consent.

For example, we use Personal Information to personalize, develop, and market our products and services; conduct research and data analysis; maintain our facilities and infrastructure, protect health and safety; operate and manage IT and communications systems; facilitate communications; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit, and other internal functions, such as internal investigations; comply with the law, legal process, and internal policies; maintain records; and exercise and defend legal claims.

### **Disclosure of Personal Information for Business Purposes**

In the past 12 months, we have disclosed the following categories of Personal Information relating to California residents to the following categories of third parties for our business purposes.

	<b>Our affiliates</b>	<b>Service Providers</b>	<b>Governmental or other public authorities</b>	<b>Credit Bureaus</b>	<b>Employer or Plan Sponsor</b>	<b>Agents or financial professionals</b>
<b>Personal Identifiers</b>	X	X	X	X	X	X
<b>Personal Data</b>	X	X	X	X	X	X
<b>Protected Class Information</b>	X	X	X		X	X
<b>Transaction Information</b>	X	X	X		X	X
<b>Biometric Information</b>	X	X	X		X	
<b>Online Use of Information</b>	X	X	X		X	
<b>Geolocation Information</b>	X	X	X			
<b>Audio/Video Data</b>	X	X	X		X	
<b>Employment Information</b>	X	X	X			X
<b>Education Information</b>	X	X	X			
<b>Inferences</b>	X	X	X			

The purposes for which we disclose Personal Information depend on our relationship or interaction with a specific California resident. We disclose for the purposes below:

- to operate, manage, and maintain our business;
- to provide our products and services;
- for employment purposes;
- to confirm the accuracy of data received; and
- as directed by the individual the Personal Information is about or with their consent.

Additionally, as a financial services company, we may also receive requests for information from regulatory authorities, our auditors, and/or our legal advisors. If requested from such parties, we would share your Personal Information as appropriate.

### Share and/or Sale of Personal Information

We sell or share Personal Information for the purpose of advertising. In the past 12 months we have shared for purposes of cross-context behavioral advertising (data sharing that exists to provide more targeted advertising across websites and over time) or sold the following categories of Personal Information relating to California residents to the following categories of third parties:

	<b>Advertising Networks</b>	<b>Social Networks</b>
<b>Personal Identifiers</b>	X	X
<b>Personal Data</b>	X	X
<b>Protected Class Information</b>		
<b>Transaction Information</b>		
<b>Biometric Information</b>		
<b>Online Use of Information</b>	X	X
<b>Geolocation Information</b>	X	X
<b>Audio/Video Data</b>		
<b>Employment Information</b>		
<b>Education Information</b>		
<b>Inferences</b>	X	X

Note: PGIM, Inc. and its affiliates comprising Prudential's global investment management businesses do not sell or share Personal Information.

PGIM does share information internally and with certain third-parties. These third-parties are our business partners and contractors, and they are bound by contracts, agreements, and monitoring to ensure that your data is treated with utmost protection and respect. Each

third-party is carefully vetted, to ensure that they have adequate protection in place to protect your data before we agree to work with them.

### **Third Parties**

We allow certain third-parties to control the collection of Personal Information from you when you browse our websites via tracking devices such as third-party cookies, pixels, and web beacons. For a full list of third-parties that control the collection of Personal Information from you on our website, visit our Cookie Preference Center. Personal Information gathered by third-parties when you browse our website is subject to the privacy policies and notices of those third-parties, and their privacy practices will differ from our practices described in this California Resident Privacy Statement and Notice.

### **Children Under the Age of 16**

Our website does not target consumers under 16 years of age. We do not knowingly collect, sell, or share the Personal Information of consumers under 16 years of age.

### **Retention of Personal Information**

We retain Personal Information, in compliance with our records retention policies and for as long as needed based on the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- the length of time we have an ongoing relationship with you and provide you with the products and services you request;
- whether there is a legal obligation we are subject to (for example, certain laws require us to keep records of certain transactions for a certain period of time before we can delete them);
- if there is a contractual obligation we are subject to; or
- whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

The same Personal Information about you may be used for more than one purpose, each of which may be subject to different retention periods based on the factors listed above.

### **Rights of California Residents**

If you are a California resident, you have the following privacy rights regarding your Personal Information.

These rights do not apply with respect to information that we collect about you in connection with providing financial products or services for personal, family, or household purposes or for long-term care or individual health products.

For more information regarding your privacy rights, please refer to our [Prudential Privacy Center](#) or the [PGIM Privacy Center](#).

### **Your Right to Access**

You have the right to request the following information collected and disclosed by us since January 1, 2022:

- the categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
- the business or commercial purpose for collecting, selling, or sharing Personal Information about you;
- the categories of Personal Information about you that we disclosed to third parties for a business purpose and the categories of third parties to whom we disclosed Personal Information (if applicable);
- the specific pieces of Personal Information we have collected and retained about you.

### **Your Right to Delete**

If you are a California resident, you may also request that we delete the Personal Information we have collected about you.

We may decline to honor your request, in full or part, for certain reasons, such as a legal exemption or where the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law. For example, we cannot delete information about you while continuing to provide you with financial products or services or where required to be retained for regulatory purposes.

For example, if the information you are requesting is subject to certain federal privacy laws, like the GLBA or HIPAA, that are outside the scope of the CCPA rights requests, we may decline to honor your request.

### **Your Right to Correct**

If you are a California resident, you may also request that we correct inaccurate Personal Information that we maintain about you. We must verify your identity before honoring your request. We may also deny a request to correct if we determine that the contested Personal Information is more likely than not accurate based on the totality of the circumstances.

## **Your Right to Opt-Out of the Share/Sale of Your Personal Information**

You have the right to request that we no longer share or sell your Personal Information for cross-contextual behavioral advertising (data sharing that exists to provide more targeted advertising across websites and over time). To exercise your privacy rights, please refer to our Privacy Center at <https://www.prudential.com/links/privacy-center>.

Additionally, you may also set your browser or device to send an opt-out preference signal, such as through the Global Privacy Control (GPC), to signal your request to opt-out of the sale and sharing of your Personal Information. We honor these requests with respect to any Personal Information connected to the preference signal based on the information made available by the preference signal protocol. Note that we may not be able to tie a browser or device-based preference signal request to all Personal Information we have about you.

To learn more about the GPC and download browsers and extensions that will notify us of your privacy preferences, visit [www.globalprivacycontrol.org](http://www.globalprivacycontrol.org).

## **How to Make Privacy Rights Requests**

If you are a California resident, you may request to exercise your privacy rights for the Personal Information we collected about you, by contacting us at:

- 1-844-PRU-DSAR ([1-844-778-3727](tel:1-844-778-3727)); or
- [Prudential Privacy Center](#) or the [PGIM Privacy Center](#).

For some privacy rights requests, we must verify that you are who you say you are. For example, if you have an online account with us, we may require that you log into that account as part of submitting the request.

- In some instances, you will also be asked additional questions to verify your identity. Information collected for purposes of verifying your request will only be used for verification and to respond to your Personal Information request. For deletion requests, once you submit a verifiable request for deletion you will be asked to confirm separately that you want Personal Information about you deleted.

## **Requests by Authorized Agents**

A California resident may authorize an agent to make an access or deletion request on behalf of the California resident, who may do so by contacting us at the toll-free telephone number or website listed above.

In general, if an authorized agent makes a request on behalf of a California resident, we will:



- require that the California resident provide the authorized agent with written permission signed by the California resident authorizing the agent to make the request on the individual's behalf ("Signed" means that the permission has either been physically signed or provided electronically in accordance with the Uniform Electronic Transactions Act, Civil Code 1633.7 et seq.);
- verify the identity of the California resident as we would if the California resident were making the request directly; and
- obtain confirmation from the California resident that the individual authorized the agent to make the request.

### **Limiting or Declining Your Request**

We may limit the response or decline to honor your request where:

- providing such information would be impossible or involve disproportionate effort (e.g., greater than 12 months prior to your request);
- we cannot verify your identity or confirm that the Personal Information that we maintain relates to you;
- we cannot verify that you have the authority to make a request on behalf of another individual;
- we may decline to honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer; or we may also decline to honor your request where the Personal Information that we maintain about you is not subject to the CCPA's access and/or deletion right.

### **Your Right to be Free from Discrimination**

We are prohibited by California law from discriminating or retaliating against you (e.g., employees, applicants, independent contractors) for exercising any of these privacy rights.

### **Contact Us**

If you have any questions regarding this California Resident Privacy Statement or our privacy policies and practices, please contact us at [1-877-248-4019](tel:1-877-248-4019).

### **Changes to This California Resident Privacy Statement**

We may change or update this California Resident Privacy Statement from time to time. When we do, we will post the revised California Resident Privacy Statement on this page with a new "Last Updated" date.