

Privacy Addendum for California Residents

Effective Date: January 1, 2020

This Privacy Addendum for California Residents (the “**California Addendum**”) supplements the information contained in our Privacy Policy (the “**Privacy Policy**”) and applies solely to residents of the State of California (“**consumers**” or “**you**”).

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and, unless defined in this California Addendum or the Privacy Policy, any terms defined in the CCPA have the same meaning when used in this California Addendum. If you are a California resident with disabilities and want to be provided with an accessible version of this California Addendum, please contact us by calling 877-788-4012.

Sentry reserves the right to amend this California Addendum at any time.

Information we collect

Sentry offers and administers a variety of annuity, life, retirement savings plans, and property and casualty insurance products and services. Depending on your relationship with us—policyholder, insured, claimant, annuity owner, certification owner, beneficiary, producer (e.g. broker and agent), business partner, vendor, or other person or entity—Sentry may collect or receive 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 or household (“**personal information**”). Again, depending on the product or service, Sentry may collect or receive and retain the following categories of consumer information within the last twelve (12) months:

- **Identifying information:** e.g., we may collect your name, mailing address, email address, business and/or personal address, telephone number, mobile phone number, fax numbers, Social Security number, driver’s license number, contract or policy number, or other similar identifiers.
- **Personal information categories listed in the California Customer Records statute Cal. Civ. Code § 1798.80(e):** e.g., we may collect name, signature, Social Security number, physical characteristics or description (height and weight), address, telephone number, driver’s license or state identification card number, insurance policy number, education history, employment history, bank account number, credit card number, debit card number, or any other financial information, and health and personal medical information.

- **Protected classification characteristics under California or federal law:** e.g., we may collect age, race, national origin, gender, citizenship, marital status, medical history; physical, mental, medical condition or treatment, medical procedures performed; health status, injury, or disability information; personal habits (for example, smoking or consumption of alcohol); prescription information; payment for medical treatment; and other similar health information or military background.
- **Commercial information:** e.g., we may collect employer information, business owner names and percent ownership, identification of insured property (such as addresses, vehicle ID numbers, or vehicle license plate numbers), records of personal property, records of products or services purchased, or other purchasing or consuming histories or tendencies.
- **Internet or other similar network activity:** e.g., we may collect social media interaction information and information related to your browsing history, search history, and other information regarding your interaction with our platforms.
- **Geolocation data:** e.g., we may collect mailing address, resident state, resident county, employee address, employer address, accident or injury state, or vehicle garaging address.
- **Audio data:** e.g., we may collect audio of your contact with Sentry in the form of a recorded statement.
- **Professional or employment-related information:** e.g., we may collect employment applications, resumés, work history, applicant assessment information, or performance evaluation information.
- **Inferences drawn from other personal information:** e.g., we may collect information about the browser you are using, what site you came from, or what site you visit when you leave us.

Personal information does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Information excluded from the CCPA's scope, like certain health or medical information and other categories of information protected by different laws.

How we collect your information

Sentry has obtained the categories of personal information listed above from a variety of sources:

- **Directly from you:** e.g., we may receive personal information directly from you, through written documents, through our websites, or through mobile applications.
- **Indirectly from you:** e.g., we may get information from you based on your usage of our websites and mobile apps, or through cookies.
- **Third parties:** e.g., we may get information from producers, appraisers, adjustors, claims handlers, other insurance companies, reinsurers, vendors, consumer reporting agencies, account verification services, social media websites, and other publicly available sources of information.

Use of personal information

We have used or disclosed the personal information we collected for the following business purposes:

- **Underwriting and policy issuance, maintenance, and renewal:** To underwrite and issue, maintain, and renew annuity contracts and insurance policies or related products, obtain reinsurance, and communicate important information to you throughout this process, Sentry may collect, use, and share (“process”) the above mentioned categories of information about policyholders, insureds, producers, loss payees, enrollees, annuity owners, certificate owners, annuitants, participants, beneficiaries, trustees, legal representatives, reinsurers, underwriters, appraisers, actuaries, and other related persons or entities. We process this information to enter into and perform our contractual obligations to you and for our legitimate business purposes.
- **Claims review and approval:** To process claims under an annuity contract, life insurance policy, property and casualty insurance policy or related contract, and to communicate with you throughout this process, Sentry may process the above mentioned categories of information about claimants, policyholders, insureds, annuity owners, certificate owners, annuitants, beneficiaries, trustees, legal representatives, witnesses, loss payees, claims administrators, adjusters, agents, advisors, brokers, and other third parties. We process this information to perform our contractual obligations to you and for our legitimate business purposes.
- **Payment:** To collect premium payments, collect purchase payments, collect reinsurance proceeds, purchase reinsurance, make annuity payments, process annuity withdrawals and loans, pay annuity death claims, pay insurance claims, pay third-party service providers and other payees, and make other business-related payments, Sentry may process

the above mentioned categories of information about policyholders, insureds, reinsurers, annuity owners, certificate owners, annuitants, beneficiaries, trustees, claimants, loss payees, appraisers, adjustors, third party administrators, professional advisors, vendors, and other payees. We process this information to perform our contractual obligations to you and for our legitimate business purposes.

- **Internal operations:** Sentry may process the above mentioned categories of information for purposes of Sentry's internal business operations, including but not limited to marketing, servicing your account, improving our products and services, data security, financial, claim or other audits, quality assurance measures, resolving complaints, identifying and preventing fraud, managing commercial risk, complying with legal, regulatory, and contractual obligations, business continuity and disaster recovery, complying with internal policies and procedures, communicating important information regarding our policies, terms and conditions, and other administrative information, communicating with agents, advisors, brokers, policyholders, contract owners, certificate owners, and beneficiaries, responding to requests for information, website personalization and optimization, as well as actuarial studies, analytics, and statistical modeling. We process this information to perform our contractual obligations to you, for our legitimate business purposes to provide and customize our products and services to you and to secure your information, and to comply with legal obligations and exercise any legal rights we may have.

Sharing personal information

Disclosures of personal information for a business purpose

In the preceding twelve (12) months, Sentry may have shared your personal information (as defined in **Information we collect**) to the following categories of entities for the purposes described in the section **Use of personal information** above:

- **Business partners, subsidiaries, and affiliates:** In connection with our business operations, to provide products and services, and to comply with applicable laws, regulations, and legal agreements, Sentry may share information with business partners, subsidiaries, and affiliates.
- **Professional advisors:** In order to comply with applicable laws and insurance regulations, to obtain professional advice and services, and in connection with our business operations, Sentry may disclose personal information to accountants, auditors, lawyers, bankers, insurers, and other professional advisors.

- **Insurance-related business partners and third parties:** In connection with our business operations and to provide products and services, Sentry may share information with underwriters, actuaries, appraisers, brokers, agents, advisors, and loss adjusters; claims administrators; medical services companies; insurance support organizations; reinsurance providers; other insurance companies; financial institutions; payment processors; securities firms; credit bureaus; investment advisors; consumer reporting agencies; and other third parties.
- **Other vendors:** In order to provide products and services and to support our business operations, Sentry may share information with vendors such as IT vendors, records management, and data storage providers; data analytics companies; marketing and market research companies; translators; collection agencies; and other vendors.
- **Legal and regulatory:** For the purpose of meeting our legal and regulatory obligations, or otherwise as allowed or required by law, Sentry may share personal information with third parties such as federal, state, and local regulatory authorities, tax authorities, law enforcement, or judicial bodies, or other persons or entities in response to a legal process (such as a subpoena).
- **Authorized representatives and successors in interest:** Sentry may share personal information with your agent, representative, attorney-in-fact, or guardian. If an interest in the annuity contract, life insurance policy, or property and casualty insurance policy is transferred or assigned, or otherwise passes to a new owner, assignee, or other successor, Sentry may share personal information with that successor to the extent needed to confirm the successor's interest. After your death, Sentry may share personal information with your executor, administrator, or personal representative, your beneficiary, or other legally authorized successor to your interest in the annuity contract, life insurance policy, or property and casualty insurance policy.
- **Marketing:** Sentry may disclose your personal information to a third-party marketing vendor in connection with the marketing efforts of Sentry.

Sales of personal information

Sentry does not sell consumers' personal information and has not sold consumers' personal information in the last twelve (12) months.

Your rights and choices

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to specific information and data portability rights

You have the right to request that Sentry disclose certain information about our collection, use, disclosure, and sale (if applicable) of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (see **Exercising access, data portability, and deletion rights**), we will disclose to you:

- The categories of personal information we collected about you
- The categories of sources from which the personal information was collected
- Our business or commercial purpose for collecting or, if applicable, selling the personal information
- The categories of third parties with whom we share the personal information
- The specific pieces of personal information we collected about you.
- If we disclosed your information for a business purpose, or sold (if applicable) your personal information, two separate lists identifying:
 - The categories of personal information disclosed, and the categories of third parties to whom the personal information was disclosed
 - If applicable, the categories of personal information sold, and the categories of third parties to whom the personal information was sold

Deletion request rights

You have the right to request that Sentry delete any of your personal information that we have collected or maintained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see **Exercising access, data portability, and deletion rights**), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities
- Debug to identify and repair errors that impair existing intended functionality

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law
- Comply with the California Electronic Communications Privacy Act
- 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 the deletion of the information is likely to render impossible or seriously impair the research's achievement, if you previously provided informed consent
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us
- Comply with a legal obligation
- Otherwise use the personal information internally and in a lawful manner that's compatible with the context in which you provided it

Exercising access, data portability, and deletion rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request by calling us toll-free at 877-788-4012, or making an online request. Making a verifiable consumer request does not require you to create an account with us. Please note that Sentry is not obligated to provide information to a consumer in response to a request more than twice in a twelve (12) month period.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf (an "**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.

The verifiable consumer request must:

- Provide sufficient information that allows us to verify you are the person about whom we collected personal information, or an Authorized Agent. We will verify that the request came from you by confirming your identity as follows:
 - Requestor must validate personal information that is being used within the verification procedure
 - Requestor must provide additional identifying elements as required
 - Requestor must sign a Declaration of Penalty Under Perjury to obtain personal information (Note: A signed Declaration of Penalty Under Perjury is not required to obtain categories of information)
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will be unable to fulfill your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. With few exceptions, we will only fulfill a request from your Authorized Agent if:

- You grant the Authorized Agent written permission to make a request on your behalf
- You or the Authorized Agent provides us notice of that written permission
- We are able to verify your identity in connection with that notice and the request

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we need more time (up to 45 additional days), we will notify you via a phone call or voice message, and provide you with an explanation of the reason for the extension.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We will deliver our written response by mail or electronically, at your option. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information to another entity without hindrance.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Contact Information

If you have any questions or comments about this California Addendum, the ways in which Sentry collects and uses your information described in this California Addendum or in the Privacy Policy, or your choices and rights regarding such use, please do not hesitate to contact us at:

Phone: 877-788-4012

Email: Privacy@Sentry.com

Mailing address: 1800 North Point Drive, Stevens Point, WI 54481