

## Privacy Addendum for California Residents

Effective Date: January 1, 2023

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 as amended by the California Privacy Rights Act of 2020 (collectively the “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 800-473-6879. You can also **print** this California Addendum as a separate document.

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

Please note, personal information does not include:

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

### **Information Handling Practices**

Sentry offers and administers a variety of insurance and/or financial products and services, including annuity, life, and property and casualty insurance products and services and retirement savings plans. Depending on your relationship with us – policyholder, insured, claimant, annuity owner, certificate owner, beneficiary, producer (e.g. broker and agent), business partner, vendor, or other person or entity – Sentry may collect or receive information that is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”).

Please see the below list of: (i) the categories of personal information collected in the preceding 12 months; (ii) the categories of sources from which personal information is collected; (iii) the business or commercial purpose for collecting, selling, or sharing personal information; and (iv) the categories of third parties to whom we disclose personal information.

### **Categories of Personal Information we Collect**

- **Identifiers:** 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, online identifier, Internet Protocol address, 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; some personal information included in this category may overlap with other categories
- **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 applications, websites, advertisements, or other platforms or media
- **Geolocation data:** e.g., we may collect your precise physical location and/or movement
- **Sensory data (audio, electronic, visual, thermal, olfactory or similar):** e.g., we may collect audio of your contact with Sentry in the form of a recorded statement or phone call, or visual information on our security cameras
- **Biometric information:** e.g. we may collect genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data
- **Professional or employment-related information:** e.g., we may collect employment applications, resumés, work history, applicant assessment information, or performance evaluation information; driving record or driving history
- **Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)):** e.g., education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records
- **Inferences drawn from other personal information:** e.g., we may collect and create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
- **Sensitive personal information:** e.g., personal information that reveals: a Social Security number or other government identifier; account login information or a financial account number with associated credentials; precise geolocation; contents of mail, email, or text messages; or genetic information. Or any of the following: the processing of biometric information to uniquely identify a consumer; collection and analysis of information that concerns a consumer's health information; collection and analysis of information that concerns a consumer's sexual orientation or sex life

### 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 from forms or materials you submit, written documents you submit, or from our communications with you
- **Indirectly from you:** e.g., we may get information from you based on your usage of our websites and mobile apps, or through cookies
- **Others obtaining insurance or financial products and services from us:** e.g. your employer or one of your business partners obtaining insurance coverages or financial services that relate to you may provide us with your personal information to secure such products or services
- **Government entities:** e.g. an insurance department may provide us information in order for us to address a question or complaint
- **Operating systems and platforms:** e.g. a devices operating system may provide geolocation data when interacting with our website or mobile app
- **Social networks:** e.g. we may get information from social networks as part of claim investigations. Additionally we may get applicant information from social networks.
- **Data brokers:** e.g. we may get information from companies in order to research previous loss, identify and asses risk, and identify potential fraud
- **From publicly accessible sources:** e.g. such as property records, social media websites, and police reports
- **From a third party with your consent or at your direction:** e.g. such as your bank or insurance agent or broker
- **Others:** e.g., we may get information from service providers, sanctions screening providers, credit reporting agencies, consumer reporting agencies, account verification services, customer due diligence providers, individuals or companies involved with obtaining coverages or processing your claim (e.g., appraisers, adjustors, claims handlers), other insurance companies, or reinsurers

### Use of Personal Information

We may use or disclose the personal information we collected for the purposes described below:

- **To fulfill or meet the reason you provided the information:** e.g., if you share your name and contact information to request a quote or ask questions about our products or services, we will use that information to respond to your request
- **To provide insurance products and services, such as:**
  - To underwrite and issue, maintain, and renew annuity contracts and insurance policies or related insurance products and services, obtain reinsurance, and communicate important information to you throughout this process
  - To process and respond to your requests and prevent transaction fraud
  - 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
  - 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 service providers and other payees, make other business-related payments and prevent transactional fraud
  - To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party websites, and via electronic mail and/or text message (with your consent, where required by law)
  - To provide you with support and to respond to your inquiries, including to investigate and address your concerns, and to monitor and improve our responses

- To contact you regarding your use of any of our products and services and, in our discretion, changes to the any of our services and/or any of our services' policies
- To conduct analytics to help us manage our business and improve our products and services such as to market our products or services, to conduct actuarial studies, analytics, and statistical modeling
- To obtain information from others that is necessary to provide insurance products or services, e.g., a consumer report from a consumer reporting agency
- To establish, update, and maintain customer and insurance records
- **To provide technology services and support, such as:**
  - To provide, support, personalize, and develop our website and mobile applications, website personalization and optimization
  - To debug our data and systems, and to repair errors
  - To ensure our products and services are available via our business continuity and disaster recovery planning
- **To secure our data, information systems and physical facilities, such as:**
  - To maintain the safety, security, and integrity of our website, products and services, databases information, and other technology assets
  - To prevent and detect unauthorized access and modification to systems
- **Fraud detection and preventions, such as:**
  - To prevent and detect fraud against you or us, identify our customers and verify their identity, and screen for financial and other sanctions or embargoes
- **To comply with legal obligations, such as:**
  - To provide information to regulators or other examiners or third parties for audits, inquiries, or investigations; to comply with professional, legal, and regulatory obligations that apply to our business (such as rules issued by insurance regulators), resolve complaints, or comply with our internal policies or contractual obligations
  - To support a legal or regulatory proceeding to the extent necessary
  - To respond to requests for information pursuant to regulatory requests or other legal proceedings
- **For Sentry's general internal business operations, such as:**
  - To market our products and services, improve our products or services, or make our processes more efficient
  - To create, maintain, customize, service, and secure your account, communicate important information regarding our policies, terms and conditions, and other administrative information
  - To communicate with agents, advisors, brokers, policyholders, contract owners, certificate owners, and beneficiaries
  - To conduct or facilitate financial, claim, or other audits or quality assurance measures
  - To manage our business and commercial risk
  - To refine our internal operations, improve efficiency, and conduct training
  - To establish and maintain an employment relationship, if applicable
- **For employment-related purposes of Sentry employees and applicants, such as:**
  - To recruit employees
  - To administer benefits
  - To pay for and reimburse expenses
  - To conduct performance-related reviews
  - To monitor work-related licenses and credentials
  - To provide our employees with human resources management
  - To maintain your contact information
  - To assist you in case of personal or business emergency
  - To monitor eligibility to work in the U.S.

- To conduct healthcare-related services
- To facilitate a better working environment
- To ensure a safe and efficient working environment
- To maintain security on Sentry websites and internet-connected assets
- To comply with applicable law or regulatory requirements

We will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without providing you notice.

We impose contractual obligations on service providers and contractors to ensure they can only use your personal information for appropriate purposes.

**Disclosures of Personal Information to Third Parties**

In the preceding twelve (12) months, Sentry may have disclosed your personal information to the following categories of third parties:

- **Professional advisors:** 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 and service providers
- **Other businesses that allow us to provide our products and/or services:** In connection with our business operations and to provide products and services, Sentry may disclose information to reinsurance providers, other insurance companies, financial institutions, payment processors, securities firms, credit bureaus, consumer reporting agencies, and other third parties
- **Legal and regulatory authorities:** To meet our legal and regulatory obligations, or otherwise as allowed or required by law, Sentry may disclose personal information to third parties such as federal, state, and local regulatory authorities, tax authorities, law enforcement, 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 disclose personal information to 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 disclose personal information to that successor to the extent needed to confirm the successor’s interest; after your death, Sentry may disclose personal information to 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 firms:** Sentry may disclose your personal information to a third-party marketing vendor in connection with marketing efforts

The following chart provides more detailed information about the disclosure of each category of personal information to third parties for a business purpose or purposes.

Category of Personal Information	Category of Third Party Recipient	Business Purpose Disclosed For
Identifiers	Professional advisors  Legal and regulatory authorities	To fulfill/meet the reason you provided the information

	<p>Authorized representatives and successors in interest</p> <p>Other businesses</p>	<p>To provide insurance products and services</p> <p>To provide technology services and support</p> <p>To ensure our data, information systems and physical facilities</p> <p>Fraud detection and prevention</p> <p>To comply with legal obligations</p> <p>For general internal business operations</p> <p>For employment-related purposes of Sentry employees and applicants</p>
<p>Personal information described in subdivision (e) of Section 1798.80</p>	<p>Professional advisors</p> <p>Legal and regulatory authorities</p> <p>Authorized representatives and successors in interest</p> <p>Other businesses</p>	<p>To fulfill/meet the reason you provided the information</p> <p>To provide insurance products and services</p> <p>To provide technology services and support</p> <p>To ensure our data, information systems and physical facilities</p> <p>Fraud detection and prevention</p> <p>To comply with legal obligations</p> <p>For general internal business operations</p> <p>For employment-related purposes of Sentry employees and applicants</p>
<p>Protected characteristics or classifications</p>	<p>Professional advisors</p> <p>Legal and regulatory authorities</p> <p>Other businesses</p>	<p>To fulfill/meet the reason you provided the information</p> <p>To provide insurance products and services</p>

		<p>To comply with legal obligations</p> <p>For employment-related purposes of Sentry employees and applicants</p>
Commercial information	<p>Professional advisors</p> <p>Legal and regulatory authorities</p> <p>Authorized representatives and successors in interest</p> <p>Other businesses</p>	<p>To fulfill/meet the reason you provided the information</p> <p>To provide insurance products and services</p> <p>To provide technology services and support</p> <p>For our internal business operations</p>
Biometric information	<p>Legal and regulatory authorities</p> <p>Other businesses</p>	<p>To provide insurance products and services</p> <p>To secure our data, information systems and physical facilities</p> <p>Fraud detection and prevention</p>
Sensory information	<p>Legal and regulatory authorities</p> <p>Other businesses</p>	<p>To provide insurance products and services</p> <p>Fraud detection and prevention</p> <p>To comply with legal obligations</p> <p>For employment-related purposes of Sentry employees and applicants</p>
Professional or employment-related information	<p>Professional advisors</p> <p>Legal and regulatory authorities</p> <p>Other businesses</p>	<p>To fulfill/meet the reason you provided the information</p> <p>To provide insurance products and services</p> <p>For our general internal business operations</p> <p>For employment-related purposes of Sentry employees and applicants</p>
Sensitive personal information	<p>Professional advisors</p> <p>Legal and regulatory authorities</p>	<p>To fulfill/meet the reason you provided the information</p>

	Other businesses	<p>To provide insurance products and services</p> <p>To secure our data, information systems and physical facilities</p> <p>Fraud detection and prevention</p> <p>To comply with legal obligations</p> <p>For our general internal business operations</p> <p>For employment-related purposes of Sentry employees and applicants</p>
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**Sharing Personal Information**

Sentry may provide your personal information to the categories of third parties below for purposes of cross-context behavioral advertising (targeted advertising). We share this information to provide you with a customized experience on our websites and to tailor advertisements to you.

Category of Personal Information	Category of Third Party Recipient	Business Purpose Disclosed For
Identifiers	Marketing firms	For general internal business operations (to market products and services to you)
Internet or other electronic network activity information	Marketing firms	For general internal business operations (to market products and services to you)
Geolocation data	Marketing firms	For general internal business operations (to market products and services to you)
Inferences drawn from personal information	Marketing firms	For general internal business operations (to market products and services to you)

**Sales of Personal Information**

Sentry does not sell your personal information and has not sold your personal information in the preceding twelve (12) months.

**Personal Information and Children**

We do not do business with children. We do not authorize persons less than 16 years of age to use our website or independently purchase our products or services. While we may collect information of individuals less than 16 years of age for purposes of providing products or



services (e.g. claims administration), we do not sell or share the personal information of those who we know are under 16 years of age without affirmative authorization.

### **Sensitive Personal Information**

We do not use or disclose your sensitive personal information for purposes other than the following:

- (1) To perform the services or provide the goods reasonably expected by you when you request those goods or services.
- (2) To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information.
- (3) To resist malicious, deceptive, fraudulent, or illegal actions directed at us or you and to prosecute those responsible for those actions.
- (4) To ensure the physical safety of individuals.
- (5) For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us, however, for this use your sensitive personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us.
- (6) To perform services on our behalf, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf.
- (7) To verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.

### **Your Privacy Rights**

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

#### **The Right to Know and Access Your Information**

You have the right to request that Sentry disclose certain descriptions and categories of the personal information we collect, use, share, disclose, and sell about you. Once we receive and confirm your verifiable consumer request, 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 sharing the personal information
- The categories of third parties to whom we disclosed the personal information
- The specific pieces of personal information we collected about you

#### **The Right to Request Deletion**

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, we will delete (and direct our service providers and contractors to delete) your personal information from our records, unless an exception applies. We may no longer be able to provide certain products or services if you exercise your right to delete.

### **The Right to Request Correction**

You have the right to correct your personal information. Once we receive and confirm your verifiable request we will use reasonable efforts to update your information, unless an exception applies. We will also ask any service providers or contractors to whom we have disclosed inaccurate information to correct it.

### **The Right to Opt-Out of the Sharing of Personal Information**

You have the right to opt out of the sharing of personal information that we have collected from you. You have several options to exercise this right. You may:

- Turn on opt out preference signals as described in more detail here [link to Opt-Out Preference Signals]
- Complete an online [request form](#)
- Call us, toll-free, at 877-788-4012
- Email us at [Privacy@Sentry.com](mailto:Privacy@Sentry.com)

If we have actual knowledge that you are less than 13 years old, we will not share your personal information without the consent of a parent or guardian.

### **The Right to Opt-Out of the Selling of Personal Information**

We do not sell your personal information.

### **The Right to Limit the Use of Your Sensitive Personal Information**

We do not use your sensitive personal information except as allowed by the CCPA.

### **Exercising your Rights**

To exercise the rights described above, please submit a verifiable consumer request by calling us toll-free at 877-788-4012, or making an [online request](#). You may make up to two requests in any 12 month period. Making a verifiable consumer request does not require you to create an account with us.

Only you, or a person 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.

When you submit a request, you will need to provide us with:

- Enough information to identify you (such as your first and last name, email address, physical address, and phone number)
- A description of what right you want to exercise and the information to which your request relates

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.

### **Opt-Out Preference Signals**

If you have an opt-out preference signal enabled (such as a "Do Not Track" signal or global privacy control), your preferences are being honored. You do not need to take any additional action. The signal applies to the browser you are using. To enable an opt-out preference signal, look for Privacy or Security settings in your browser. Options may vary by browser and may change periodically.

### **How Long Your Personal Information Will Be Kept**

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which the data was collected, and the applicable legal requirements.

### **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](mailto:Privacy@Sentry.com).

Website: [Sentry.com](https://www.sentry.com).

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