



PRIVACY POLICY FOR THE INDUSTRIAL ALLIANCE GROUP – US OPERATIONS

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The Industrial Alliance Group-U.S. Operations is composed of Industrial Alliance Insurance and Financial Services Inc.’s

U.S. Branch and Industrial Alliance Insurance and Financial Services Inc.’s subsidiaries, including but not limited to IA American Life Insurance Company, American-Amicable Life Insurance Company of Texas, Occidental Life Insurance Company of North Carolina, Pioneer American Insurance Company, Pioneer Security Life Insurance Company and Industrial Alliance Portfolio Management (U.S.) LLC (“we/us”). Together, we are committed to protecting our clients’, employees’ and representatives’ (“you/your”) privacy, and to ensuring the confidentiality of the personal information provided to us in the course of our business.

Our Privacy Policy sets out our standards for collecting, using, disclosing and storing your personal information. Our Privacy Policy also explains how we safeguard your personal information and your right to access that information. It provides you with a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights you have regarding your personal information. If you have a disability you may access the Privacy Policy in an alternative format at: www.americanamicable.com

PERSONAL INFORMATION

Personal Information as defined in this privacy policy includes both categories and specific information. Within the preceding 12 months, we have collected the following categories of personal information:

Categories of Personal Information	Categories of Sources	Categories of Purpose	Third Parties With Whom Business Shares Information	Third Parties to Whom Business Sells Information
Personally Identifiable Information, including, but not limited to, name, SSN, financial information, address, phone number, geolocation data, signature, height, weight, insurance policy number, health insurance information, health data, passport, driver’s license	Application Premium Accounting Claims Forms	Application processing Claims processing Premium processing Benefit payment processing Accounting Legal Audit	Information Verification Organizations Medical Facilities	None
Protected Classes, including, but not limited to, race, citizenship, national origin, military status, religion, sex, gender identity expression, medical condition or disability, marital status, age, genetic information	Application Claims Forms	Application processing Claims processing Premium processing Benefit payment processing Accounting Legal Audit	Information Verification Organizations Medical Facilities	None
Internet or Other Electronic Network, including, but not limited to, online identifiers, e-mail address, account name, search history, browsing history, cookie data, IP address, online interactions (web sites, applications, and advertisements)	Application Claims	Application processing Claims processing	Information Verification Organizations	None
Behavioral and Profiling Data	Application Claims	Application processing Claims processing	Information Verification Organizations	None
Professional, Employment, and Education	Application Claims	Application processing Claims processing	Information Verification Organizations Medical Facilities	None
Sensory Data	Application Claims	Application processing Claims processing	Information Verification Organizations Medical Facilities	None

Personal information has to be protected regardless of its characteristics or its form, whether written, graphic, audio, visual, computerized or any other form.

RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED OR DISCLOSED

You have the right to request that we disclose to you the personal information that we have collected, used, and disclosed over the prior twelve (12) months. In order to do so, you must submit a verifiable **Consumer Request to Know** using the request form that can be obtained by contacting us by telephone or by going through our website at the online address at the end of this document, clicking on the Privacy button, and completing and submitting to us the online Consumer Request to Know form, or by submitting a written request to the address below.

We will compare the information that you provide in the form to the information in our files in order to verify your request. The information used will include your name, your date of birth, your address, and your driver's license number.

PURPOSE OF INFORMATION COLLECTION

Collecting information about you is necessary in order for us to provide you with high quality services. The nature and sensitivity of the information we collect about you varies according to the services we provide you and to legal requirements imposed on us (such as your social security number, if investment income is generated by a chosen product).

The purposes for which we collect personal information about you are identified at or before the time of collection. For example, information may be collected while submitting an application or a claim.

Purposes for collecting information generally include; providing products or services requested, confirming your identity, protecting against fraud, or dealing with matters concerning the relationship between us..

Any questions and concerns you may have regarding the purposes for collecting information may be directed to us at either of the addresses provided below.

CONSENT

When we collect personal information from you, we obtain your consent to use the information for the purposes collected. We will obtain your consent for any additional use or collection, or if the purpose of using the information is changed.

We generally seek your express written consent in order to collect, use or disclose personal information. Where appropriate, for less sensitive information, we may accept your verbal consent. Occasionally, we may imply consent where we can infer consent from your action or inaction.

Consent must be given by you or your authorized representative such as an attorney, legal guardian or a person having power of attorney.

You may withdraw your consent at any time, subject to legal or contractual restrictions (for example, your right to withdraw consent is necessarily limited where we need information to extend a loan against the value of a policy issued by us). We will inform you of the consequences of such withdrawal, including the possibility that we may not be able to provide a product or process a request. If you choose not to consent, we will record the decision in our file.

In limited circumstances, we have the right (or obligation) to collect, use or disclose personal information without your knowledge and consent. This occurs when legal, medical, or security reasons may make it impossible or impractical to seek consent. When information is being collected for the investigation of a potential breach of contract, possible money laundering, the prevention or detection of fraud, or for law enforcement purposes, seeking consent might defeat the purpose of the information collection. Similarly, seeking consent may be impossible or inappropriate when you are a minor, seriously ill or otherwise incapacitated.

LIMITS TO COLLECTION, USE AND DISCLOSURE

We limit the collection of your personal information to what we need in relation to the purposes identified to you.

We collect the information directly from you unless you allow us to collect information from a third party or in accordance with the law.

We limit the use of your personal information to the purposes we have identified to you. This means that we cannot use your personal information for other purposes without your consent, except as permitted or required by law.

We cannot disclose your personal information to anyone except with your consent or as permitted or required by law.

Your personal information is only accessible to certain authorized persons, and only to the extent necessary to perform their duties.

You have the right to know, on request, to whom the information was disclosed. Only in rare instances are we prevented by law from honoring such a request. We maintain accurate records, recording to whom we disclose personal information and in what circumstances it was disclosed.

We will occasionally share your personal information with service providers or agents to ensure the proper administration of products, or to provide you with the services you require. These service providers or agents must agree to comply with privacy legislation before receiving any personal information.

Any questions concerning the collection, transfer or use of personal information can be forwarded to the Privacy Officer at either of the addresses provided below.

RETENTION

We only retain your personal information for as long as needed for the purpose it was collected. We must destroy this information in accordance with the law and our record retention guidelines. When we destroy your personal information, we make sure that confidentiality is secured and that no unauthorized person can access the information during the destruction process.

CLIENT LIST AND PERSONAL INFORMATION

The Company does not disclose an individual's personal information to any non-affiliated third party except as authorized by that individual. We may disclose personal information to one of our affiliated companies within the Industrial Alliance Group with the individual's written permission, or to process a transaction, such as a claim, or otherwise as permitted by law. **The Company does not, and will not, sell client lists or client personal information, regardless of our client's age, to third parties.**

ACCURACY

We make every possible effort to ensure that your personal information is as accurate and complete as necessary for the purposes it is collected, used, or disclosed.

ACCOUNTABILITY

We are responsible for your personal information in our possession or control, including information that may be transferred by us to third parties for processing. We require such third parties to keep personal information under strict standards of privacy and protection.

We adhere to legislated and self-imposed rules, aimed to safeguard your privacy. The rules are established by this Privacy Policy, the Company's privacy compliance program, the Code of Business Conduct (applicable to directors, officers and employees), and the Compliance Guidelines For Our Producers In Today's Market Place (applicable to agents and brokers) as well as insurance industry guidelines and applicable law.

Our staff is trained on these processes and procedures and is provided with information about privacy laws.

SAFEGUARDS

We have implemented and continue to implement rigorous safeguards so that your personal information remains strictly confidential and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

Protection methods include organizational measures such as requiring security clearances and limiting access to a "need-to-know" basis, physical measures (e.g. building access cards for employees, visitor registration and identification cards, off-site backups and archiving), and technological measures such as the use of password and encryption (e.g. the use of routinely changing passwords, firewalls and segmented operator access).

AUTHORIZED AGENT

You can designate an authorized agent to make a request under the California Consumer Protection Act (CCPA) on your behalf. In order to do so you should write to us at the address listed below under **REQUEST FOR ACCESS TO INFORMATION AND AMENDMENTS**. You may also contact us by telephone or through our website using the information provided at the same location below.

REQUEST FOR ACCESS TO INFORMATION AND AMENDMENTS

You have the right to be informed whether we hold personal information about you during the preceding 12 months and to see that information. You also have the right to enquire as to how we collected your information, how we used it and to whom it may have been disclosed.

This information will be provided to you within the time required by the regulation from the date we receive your written request. We may charge a reasonable fee for processing your request.

In certain limited and specific circumstances, we may refuse to provide to you the requested information. Exceptions to your access right can include information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, information that has been obtained in the course of an investigation of a potential breach of contract, money laundering or fraud, and information that is subject to attorney- client or litigation privilege.

REQUESTING DELETION OF PERSONAL INFORMATION

You have the right to request the deletion of your personal information which has been collected or maintained by us.

In order to do so, you should write to us at the same address listed below. You may also contact us by telephone or through our website using the information provided at the same location below.

Please note that as required by California Consumer Privacy Act regulations, we must use a two-step process for online requests to delete where the consumer must 1) clearly submit the request to delete and then 2) separately confirm that they want their personal information deleted.

We are not required to delete information if we meet specific exceptions; for example, in cases where we hold medical information about you, we may refuse to provide you with direct access to this information and may instead request that a health care professional be designated to provide the information to you.

You may challenge the accuracy and completeness of your personal information. We will respond to an amendment request within a reasonable time.

COMPLAINTS AND CONCERNS

Our employees and representatives are trained to respond to your questions or concerns about personal information. Should you be unsatisfied with our employee's or representative's response, you may contact the Privacy Officer at the address below. If you have a complaint concerning the protection of personal information should be addressed to the Privacy Officer at the address provided below.

Any questions or concerns about this privacy policy or our privacy practices, requests for access to information, requests for deletion of information, or requests for amendment must be sent to the following address:

Privacy Officer
IA American Life Insurance Company
425 Austin Avenue
Waco, Texas 76702
1-800-736-7311
www.americanamicable.com

You have a right not to receive discriminatory treatment by us for the exercise of the privacy rights which are presented in the California Consumer Privacy Act.

This Privacy Policy was last updated on June 8, 2021.