

# California Consumer Privacy Act Disclosure

Your privacy is important to us. This California Consumer Privacy Act of 2018 (“CCPA”) Disclosure is provided by Prudential Financial, Inc., its subsidiaries and affiliates, other than Assurance IQ, LLC and its own subsidiaries. The Prudential entities providing this Disclosure are referred to in this Disclosure as “we” or “us” and include Prudential Financial, Inc. subsidiaries and affiliates that use the names Prudential, Pruco, PRIAC and PGIM. This Disclosure explains how we collect, use, and disclose personal information relating to California residents that are subject to the CCPA.

## What is Personal Information?

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. The CCPA, 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 disclosure does not apply with respect to information that we collect about California residents who request or obtain our financial products and services 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 Privacy Centers at [www.prudential.com/links/privacy-center](http://www.prudential.com/links/privacy-center) and [www.pgim.com/links/privacy-center](http://www.pgim.com/links/privacy-center) Opens in new window.

## 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, visit our locations or facilities, or are 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.

## Our Collection of Personal Information

In the past 12 months, we have collected the following categories of Personal Information relating to California residents:

- (1) Personal Identifiers – Identifiers, such as name and Social Security number;
- (2) Personal Data – Personal information, such as contact information, medical/health information and financial information;
- (3) Protected Class Information – Characteristics of protected classifications under California or federal law, such as sex and marital status;
- (4) Transaction Information – Commercial information, such as transaction and account information;
- (5) Biometric Information – Biometric information, such as fingerprints and voiceprints;
- (6) Online Use Information – Internet or network activity information, such as browsing history and interactions with our website;
- (7) Geolocation Information – Geolocation data, such as device location;
- (8) Audio/Video Information – Audio, electronic, visual, thermal, olfactory, and similar information, such as call and video recordings;

- (9) Employment Information – Professional or employment-related information, such as work history and prior employer, and other information necessary for verifying employment eligibility;
- (10) Education Information – Education information, such as school, degrees earned, and graduation data; and
- (11) Inferences – Inferences drawn from any of the Personal Information listed above to create a profile/summary about, for example, an individual’s preferences and characteristics.

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.

**Our Use of Personal Information**

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

- (1) to operate, manage, and maintain our business;
- (2) to provide our products and services;
- (3) for our employment and vendor management purposes; and
- (4) to accomplish our business purposes and objectives.

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 law, legal process, and internal policies; maintain records; and exercise and defend legal claims.

**Our Disclosure of Personal Information**

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			

In the past 12 months, however, we have not “sold” Personal Information relating to California residents within the meaning of the CCPA. For purposes of this Disclosure, “sold” means the disclosure of Personal Information for monetary or other valuable consideration.

### Your Right to Know and to Delete

If you are a California resident, you may request that we disclose to you the following information covering the 12 months preceding your request:

- (1) the categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
- (2) the business or commercial purpose for collecting Personal Information about you;
- (3) 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);
- (4) the specific pieces of Personal Information we collected about you.

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

We may decline to honor your request, in full or part, for certain reasons, such as a legal exemption. 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. In some instances, we may decline to honor your request if we cannot verify your identity or confirm that the Personal Information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, 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. 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, such as information relating to our employees and contractors that is used for our employment and vendor management purposes, as well as information relating to beneficiaries or dependents of our employees that is used to administer employee benefits.

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

### How to Make Requests

If you are a California resident, you may make a request for the disclosures described above or make a request to delete Personal Information we collected from you, by contacting us at:

- (1) 1-844-PRU-DSAR ([1-844-778-3727](tel:1-844-778-3727)); or
- (2) [www.prudential.com/links/privacy-center/data-requests](http://www.prudential.com/links/privacy-center/data-requests).

When you make a request, we will attempt to verify that you are who you say you are. For example, if you have an online account with us, we will require that you log into that account. If you do not have an online account with us, we will use a third-party verification service to verify your identity.

When you make a request, we will ask you to provide the following minimum information to identify yourself:

- (1) Name;
- (2) Email Address;
- (3) Country/State of Residence.

In some instances, you will also be asked additional questions to verify your identity.

### **Requests by Authorized Agents**

A California resident may authorize an agent to make an access or deletion request on behalf of the California resident. A California resident's authorized agent may make a request on behalf of the California resident 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:

- (1) require that the authorized agent provide proof of its registration with the California Secretary of State to conduct business in California;
- (2) 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.);
- (3) verify the identity of the California resident as we would if the California resident were making the request directly; and
- (4) obtain verification from the California resident that the individual the authorized agent permission to make the request.

### **Contact Us**

If you have any questions regarding this Disclosure or our privacy policies and practices, please contact us at 1-877-248-4019.

### **Changes to This California Consumer Privacy Act Disclosure**

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

### **Footnote**

LAST UPDATED: September 21, 2021