

# JACKSON CALIFORNIA-SPECIFIC PRIVACY POLICY ("POLICY")

California consumers have certain privacy rights granted under California law. This Policy sets out some of those rights and provides individuals with means to submit Privacy Data Requests to Jackson<sup>®</sup>. Jackson<sup>®</sup> reserves the right to modify this Policy at any time and will post the current Policy incorporating those changes on this page. Changes to this Policy are effective as of the date they are posted. This Policy was last updated on March 8, 2024.

## 1. Managing Your Privacy Rights

Below is a list of privacy rights regarding your personal information under California law.

## Right to Know About Personal Information Collected Disclosed or Sold

You have the right to know what personal information Jackson<sup>®</sup> has collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom Jackson<sup>®</sup> discloses personal information, and the specific pieces of personal information Jackson has collected about you.

#### **Right to Request Deletion of Personal Information**

You have the right to request deletion of personal information collected by Jackson<sup>®</sup>, subject to certain exceptions.

#### Right to Opt-Out of the Sale of Personal Information

Jackson®does not sell your personal information, including the personal information of minors under 16 years of age without affirmative authorization. Jackson® also does not knowingly share the personal information of consumers under 16 years of age.

# Right to Opt-Out of the Sale of Personal Information Sharing and Automated Decision-Making

You have the right to opt-out of the sharing of your personal information. To optout of sharing, visit <u>Do Not Share My Personal Information</u>. You also have the



right to opt-out of automated decision-making technology and to request meaningful information about the logic involved with such decision-making processes, including a description of the likely outcome of the process with respect to you.

#### **Right to Non-Discrimination for the Exercise of Your Privacy Rights**

You have the right not to receive discriminatory treatment by Jackson® for exercising your privacy rights. We will not discriminate against you if you choose to exercise any of your rights under California law, this includes employee's, applicant's, or independent contractors.

#### **Right to Correct**

You have the right to correct any inaccurate personal information.

#### **Right to Disclosure of Retention Periods**

You have the right to request for Jackson<sup>®</sup> to disclose the period for which we intend to retain your personal information and sensitive personal information.

#### Instructions for Submitting a Verifiable Consumer Request

To exercise any of the above rights you or your authorized agent can submit a request using <u>the Privacy Data Request form</u> or by calling Jackson<sup>®</sup> Customer Service at 800-644-4565. Upon submission of your request, we will take commercially reasonable steps to verify your identity and, if applicable, your authorized agent before granting access to or making any changes to your personal information. You will be required to verify your identity by providing your first name, last name, and email address. In some instances, we may ask you to provide other information such as your mailing address or the last four digits of your Social Security Number to verify your identity. If this happens, we will reach out to you directly with this request.

The Jackson<sup>®</sup> website recognizes and responds to Global Privacy Control (GPC) signals transmitted by your internet browser, if you have configured them, to automatically update your privacy preferences. You may also opt-out of information sharing by visiting <u>Do Not Share My Personal Information</u>.

As explained in our <u>Web Privacy Policy</u>, online visitors may request changes to, or optout of collection of certain personal information at any time. Additionally, any individual who receives email marketing material from Jackson<sup>®</sup> may opt-out of further electronic communication by following the opt-out instructions contained in the email message.



We will make good faith efforts to provide you with access to your data within a reasonable time of your requesting it, but there may be circumstances in which, as legally permitted, we will not provide access, including but not limited to instances where the information is legally privileged, where your or your agent's identity could not be verified, or where the information may compromise yours or others' privacy or other legitimate rights. If we determine that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

## 2. Data Collection and Sharing Within the Past 12 Months.

In order to run our business and provide our services and products, there are occasions where we may disclose your personal information with affiliates and non-affiliated vendors that perform support services for Jackson<sup>®</sup>. These parties are subject to agreements that require them to maintain the confidentiality of your information and to use it only in the course of providing such services. We will also share information if you so direct or with your consent, if we are compelled by law or regulation, as part of a corporate transaction with a successor or affiliate or in connected with any acquisition, merger or sale of assets, or in other circumstances as permitted by law (for example, to protect your account from fraud).

Below is a list of the categories of personal information we have collected, the sources from which we collected that personal information, the business purpose for which we collected, shared, or disclosed the personal information (if applicable), and categories to whom we disclosed the personal information, all within the past 12 months and not otherwise subject to the Gramm-Leach-Bliley Act. We did not necessarily collect, use, or disclose all the specific pieces of personal information listed for any given person or business purpose. Please note that these are *categories* of personal information as they are set forth under California law. We do not sell your personal information.

#### **Personal Information Category**

(A) Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.

(B) Any categories of personal information described in subdivision (e) of Section 1798.80:

(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number,



passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

(C) Characteristics of protected classifications under California or federal law:

- Sexual orientation
- Race
- National origin
- Medical conditions
- Disability; physical or mental
- Genetic information
- Military or Veteran status
- Status as a victim of domestic violence, assault, or stalking
- Gender identity and gender expression
- Color
- Religion
- Sex (including pregnancy, childbirth, and related medical conditions)
- Age (40 or older)
- Marital status
- Political affiliations or activities

(D) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

(E) Biometric information.

(F) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.

(G) Geolocation data.

(H) Audio, electronic, visual, thermal, olfactory, or similar information.

(I) Professional or employment-related information.

(J) Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).



(K) Inferences drawn from any of the information identified in this chart to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

# 3. Business Purpose for Which the Personal Information Was Collected or Shared Within the Past 12 Months.

Below is a list of the business purposes for collection of personal information. We did not necessarily collect all the specific pieces of personal information listed above for any given business purpose.

## Business Purpose for Which the Personal Information Was Collected or Shared

(1) Auditing related to a current interaction with the consumer and concurrent transactions.

(2) Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

(3) Debugging to identify and repair errors that impair existing intended functionality.

(4) Short-term, transient use.

(5) Performing services internally on behalf of Jackson® or for service providers, including, but not limited to, maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying personal information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of Jackson® or service providers.

(6) Undertaking internal research for technological development and demonstration.

(7) Undertaking activities to verify or maintain the quality or safety of a service, information system or device that is owned, manufactured, manufactured for, or controlled by Jackson<sup>®</sup>, and to improve, upgrade, or enhance the service, information system or device that is owned, manufactured, manufactured for, or controlled by Jackson<sup>®</sup>.



(8) Employment-related purposes, including but not limited to, hiring, talent evaluation, investigations, benefits, compensation, performance evaluation, and termination.

(9) Cross-context behavioral advertising.

# 4. Categories of Sources from Which Personal Information is Collected

The categories of sources of the personal information collected is from you (through forms, correspondence, telephone, and your use of Jackson® websites), from your employer, consumer reports, and data aggregators.

# 5. Categories of Third Parties with Whom Jackson Discloses Personal Information.

Jackson<sup>®</sup> does not sell your personal information. Jackson<sup>®</sup> may share or disclose your personal information with "third-parties" as defined by California law in order to provide Jackson<sup>®</sup> with support. Jackson<sup>®</sup> does not use or disclose sensitive personal information for purposes other than those specified in section 7027, subsection (m) of the CPRA Regulations.

#### 6. Exercise Your Rights

If you have any questions about this Policy or about exercising your rights described above, you can submit a Privacy Data Request by <u>using this form</u> or by contacting us at 800-644-4565.