



# Privacy Notice for California Residents

We have adopted this notice to comply with the California Consumer Privacy Act of 2018, the California Privacy Rights Act of 2020 and their implementing regulations (collectively, the “CCPA”).

Your privacy is important to Symetra Financial Corporation and other companies that are controlled by, or under common control with, Symetra Financial Corporation (collectively referenced within this Privacy Notice as “**Symetra**,” “**we**,” “**us**,” or “**our**”). We developed this Privacy Notice for California residents (“**Privacy Notice**”) to provide California residents with information concerning our personal information collection and usage practices when you visit our website (“**Site**”) or otherwise provide us with personal information. “**Personal information**” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal Information does not include publicly available information or lawfully obtained, truthful information that is a matter of public concern.

This Privacy Notice applies solely to persons who reside in the State of California (“**consumers**” or “**you**”) whose personal information is collected by Symetra. This Privacy Notice covers Symetra’s collection, use, and sharing of personal information of consumers and your rights under the CCPA. This Privacy Notice does not address personal information that is subject to other federal data protection laws such as the Gramm-Leach-Bliley Act (“**GLBA**”), the Health Information Portability and Accountability Act (“**HIPAA**”), and the Fair Credit Reporting Act (“**FCRA**”). This Privacy Notice does not cover Symetra’s treatment of deidentified or aggregate information, personal information used for research purposes, personal information which is already available lawfully to the public from federal, state or local government records, or information that is otherwise exempt from the CCPA.

This Privacy Notice supplements any other privacy notices you receive from Symetra companies.

## Personal Information We Collect

The exact types of personal information we collect from you may vary depending on our relationship with you. We have collected the following categories of personal information in the preceding twelve (12) months:

- **Identifiers**, such as a real name, alias, postal address, unique personal identifier, online identifier, device information, email address, account name, Social Security number (“**SSN**”), driver’s license number, passport number, or other similar identifiers.
- **Personal Information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))**, such as a name, signature, SSN, physical characteristics or description, address, telephone number, passport number, driver’s license number, insurance policy number, employment, bank account number, credit or debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
- **Characteristics of Protected Classifications under California or Federal Law**, such as age, ancestry, citizenship, marital status, medical condition (including pregnancy or childbirth and related medical conditions), physical or mental disability, veteran or military status, and sex.
- **Biometric information** such as fingerprints, a voiceprint or facial recognition.
- **Internet or other electronic network activity information**, such as, browsing history, search history, and information regarding a consumer’s interaction with an internet website application, or advertisement.
- **Geolocation data**, such as city, state or IP address.
- **Audio, electronic, visual, thermal, olfactory, or similar information**, such as recorded phone calls.
- **Professional or employment-related information**, such as name, postal address, telephone number, email address, SSN, bank account number and health insurance information.
- **Inferences drawn from any of the categories of information identified in this Privacy Notice to create a profile about a consumer reflecting the consumer’s preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes**, such as inferences made in connection with the third-party talent management tool (“**Platform**”) Symetra uses in conjunction with the Platform’s machine learning capabilities to the extent associated with a consumer and job positions at Symetra, such as likely skills, matching to a particular job opportunity, and likelihood to apply for a position.
- **Sensitive personal information**.

## Sensitive Personal Information We Collect

Symetra is committed to safeguarding the privacy of any personal information that reveals information that may be considered sensitive personal information under the CCPA that may come into our possession. In the normal course of business, we have collected the following categories of sensitive personal information from consumers within the last twelve (12) months:

- A consumer's SSN, passport number, driver's license number, or state identification card.
- A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, such as a new contractor's initial, one-time ID and Password to access Symetra's network.
- A consumer's racial or ethnic origin, religious or philosophical beliefs, such as an employee's religious accommodation request or self-identified race or ethnicity if voluntarily disclosed.
- The contents of a consumer's mail, email, and text messages unless Symetra is the intended recipient of the communication, such as an employee's work emails.
- The processing of biometric information for the purpose of uniquely identifying a consumer, such as fingerprints, a voiceprint or facial recognition.
- Personal information collected and analyzed concerning a consumer's health, such as medical records or employee provided health-related data.
- Personal information collected and analyzed concerning a consumer's sexual orientation, such as an employee's sexual orientation if voluntarily provided by the employee.

## Sources from Which Personal Information is Collected

We may collect the above-described categories of personal information from one or more of the following sources:

- **Information You Provide.** We collect personal information that you provide to us, such as when you purchase a product or service, apply for employment, act as an employee, conduct business with us or call our Customer Service.
- **Financial Professionals.** We may receive information about you from your financial professional, such as when your financial professional provides us with updated information about your policy or account.
- **Third Parties Authorized by You.** We may receive information from other third parties that you authorize to provide us with information, such as consumer reporting agencies, medical professionals, financial professionals, and your current and prior employers.
- **Our Service Providers.** We may receive information about you from our service providers, such as service providers that provide us with legal, regulatory, authentication or consumer credit information and our third-party claims administrators. We may also receive information about you from a service provider to the extent related to the Platform's processing, including its machine learning capabilities, of information obtained from you and from other sources and/or your interactions with the Platform.

## Purposes for Collecting Personal Information

We may collect the above-described categories of personal information for one or more of the following business or commercial purposes:

- To provide you with the information, products, or services you request from us.
- To meet our obligations and enforce our rights arising under our agreement[s] with you, including for billing and collection purposes.
- To communicate with you, such as when you purchase a product or service, or contact us with a request or inquiry.
- To operate, manage, and maintain our business, such as making insurance decisions, accounting, auditing, and maintaining records.
- To test, research, analyze, develop, and improve our products and services.
- To conduct internal investigations.
- For security purposes, such as authentication by voiceprint or protecting against malicious or fraudulent activity.
- For evaluation of suitability for job positions, employment and vendor management-related purposes.
- To respond to law enforcement requests, to meet obligations in legal proceedings and government investigations, and as otherwise required by applicable law, court order, or government regulations.
- To protect our legal interests and to help ensure the safety of others.
- As otherwise described to you when we collect your personal information or when we provide you with an updated notice.

## Personal Information Disclosures

In connection with the purposes set forth in this Privacy Notice, we may have disclosed your personal information to one or more of the following categories of third parties within the last twelve (12) months.

- **Third parties to which you authorize us to disclose your personal information.** We may disclose personal information to third parties that you have authorized us to disclose personal information to, such as your employer or plan sponsor, and health care professionals.
  - **Categories of personal information disclosed to such third parties for a business purpose during the past 12 months:** name, physical characteristics or description, address, telephone number, passport number or driver's license number, employment, bank account number, credit or debit card number, or similar financial information, or medical information.
- **Distribution parties.** We may disclose personal information to the independent insurance professionals who sell and service our products.
  - **Categories of personal information disclosed to such third parties for a business purpose during the past 12 months:** name, physical characteristics or description, address, telephone number, passport number or driver's license number, employment, bank account number, credit or debit card number, or similar financial information, or medical information.
- **Service providers and contractors.** We may disclose personal information to service providers and contractors that perform services on our behalf.
  - **Categories of personal information disclosed to such third parties for a business purpose during the past 12 months:** name, SSN, age, sex, marital status, physical characteristics or description, address, telephone number, citizenship, ancestry, physical or mental disability, veteran or military status, familial medical information, criminal records, passport number or driver's license number, employment, credit history, bank account number, credit or debit card number, or similar financial or medical information.
- **Affiliates.** We may disclose personal information to companies that are part of Symetra's affiliated group of companies.
  - **Categories of personal information disclosed to such third parties for a business purpose during the past 12 months:** name, SSN, age, sex, marital status, physical characteristics or description, address, telephone number, citizenship, ancestry, physical or mental disability, veteran or military status, familial medical information, criminal records, passport number or driver's license number, employment, credit history, bank account number, credit or debit card number, or similar financial information, or medical information.
- **Governmental entities and third parties in connection with legal matters.** We may disclose personal information to governmental entities, such as regulatory agencies, law enforcement, and judicial authorities, as well as other third parties under any of the following conditions: (a) if we have your valid consent to do so; (b) to comply with a valid subpoena, legal order, court order, warrant, legal process, or in connection with other legal obligations or legal proceedings; (c) to enforce or apply any of our terms and conditions, policies, or other agreements; (d) to exchange information with other companies and organizations for the purposes of fraud protection and credit risk reduction; or (e) as necessary to pursue available legal remedies or defend legal claims.
  - **Categories of personal information disclosed to such third parties for a business purpose during the past 12 months:** name, SSN, age, sex, marital status, physical characteristics or description, address, telephone number, citizenship, ancestry, physical or mental disability, veteran or military status, familial medical information, criminal records, passport number or driver's license number, employment, credit history, bank account number, credit or debit card number, or similar financial information, medical information or biometric information.

Symetra does not sell personal information. Symetra has not sold personal information during the last twelve (12) months. The CCPA defines “**sell**” and “**sold**” as the disclosure of personal information to a third party for monetary or other valuable consideration.

Symetra does not share personal information. Symetra has not shared personal information during the last twelve (12) months. The CCPA defines “**share**” as the disclosure of personal information by a business to a third party for cross-context behavioral advertising whether or not for monetary or other valuable consideration, including transactions between a business and a third party for such advertising for the business' benefit where no money is exchanged. The CCPA further defines “**cross-context behavioral advertising**” as targeting advertising to a consumer based on the consumer's personal information obtained from their activity across businesses, distinctly branded websites, applications, or services, other than those with which the consumer intentionally interacts.

We do not collect, use or disclose sensitive personal information for purposes other than the following, or otherwise as specified and permitted under the CCPA therefore such sensitive personal information is not subject to a right to limit its use and disclosure:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- To prevent, detect and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, provided that the use of your personal information is reasonably necessary and proportionate for this purpose.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for those actions, provided that the use of your personal information is reasonably necessary and proportionate for this purpose.
- To ensure the physical safety of natural persons, provided that the use of your personal information is reasonably necessary and proportionate for this purpose.
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us, provided that the 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 your current interaction with us.
- To perform services on our behalf, provided that the use of your personal information is reasonably necessary and proportionate for this purpose.
- To verify or maintain the quality or safety of a product, 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.
- For purposes that do not infer characteristics about you.

We do not sell or share the personal information of consumers under 16 years of age. We have no actual knowledge that we have sold or shared the personal information of consumers under 16 years of age.

## **Your Rights Under the CCPA**

The CCPA provides consumers with the following rights regarding their personal information:

### **The Right to Know About Personal Information Collected, Used, or Disclosed**

You have the right to request that a business that collects personal information about you disclose to you the following:

- The categories of personal information it has collected about you.
- 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 the business discloses personal information.
- The specific pieces of personal information it has collected about you.

This Privacy Notice has been designed, in part, to address this right.

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

You have the right to direct a business that sells or shares your personal information not to sell or share your personal information. However, we do not sell or share your personal information.

### **The Right to Limit Use and Disclosure of Sensitive Personal Information**

You have the right to direct a business that collects your sensitive personal information for the purpose of inferring characteristics about you to limit its use of your sensitive personal information to that which is necessary for the purposes expressly authorized under the CCPA. However, we do not use or disclose your sensitive personal information for any non-authorized purposes.

## **The Right to Delete Personal Information**

You have the right to request a business to delete the personal information that it has collected about you. A business is not required to comply with your request if it is necessary for the business to maintain such personal information in order to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of the business's ongoing business relationship with you, or otherwise perform a contract between the business and you.
- Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the business's deletion of the information is likely to render impossible or seriously impair the ability to complete such research, if you have provided informed consent.
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the business and compatible with the context in which you provided the information.
- Comply with a legal obligation.

## **The Right to Correct Inaccurate Personal Information**

You have the right to request a business that maintains inaccurate personal information about you correct such inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

## **The Right to Non-Discrimination for Exercising Your Rights Under the CCPA**

You have the right to not receive discriminatory treatment by a business for exercising your CCPA rights including the right not to be retaliated against for the exercise of your CCPA rights.

## **Exercising Your CCPA Rights and Designating an Authorized Individual**

To exercise your rights as described in this Privacy Notice, please submit a verifiable consumer request to us through one of the following methods:

- Using our online form, available at [www.symetra.com/ccpa](http://www.symetra.com/ccpa).
- Calling our CCPA hotline at 1-800-SYMETRA (796-3872), extension 22216.

Only you or a person that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. You may designate an authorized individual to submit your consumer request on your behalf, so long as the authorized individual has your written permission to do so and you have taken steps to verify your own identity directly with Symetra. Before taking action in response to such a request, we will require the authorized individual to provide information sufficient to confirm you gave them signed permission to submit the request.

Because we do not sell or share personal information, or use or disclose personal information for purposes not expressly authorized under the CCPA, we do not recognize opt-out preference signals at this time.

## **Our Verification and Response to Requests Under the CCPA**

We cannot comply with your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information requested relates to you. Making a verifiable consumer request does not require you to create an account with us. Where possible, we will only use personal information that Symetra already stores to verify a requestor's identity and their authority to make the request. To verify your identity, we will ask for information when you submit your request including your contact information, the nature of your relationship with Symetra and the approximate time period of your relationship.

## Retention of Personal Information

We retain the personal information and sensitive personal information described in this Privacy Notice as required by applicable legal, regulatory, operational, and fiscal requirements (collectively, "Retention Requirements"), in accordance with our records management policy. The retention periods applicable to such personal information and sensitive personal information are based on our Retention Requirements and may vary depending on the category of information and respective need or purpose for its retention.

## Privacy Notice Updates

We will update this Privacy Notice at least once every twelve (12) months. We also may update this Privacy Notice from time to time as we add new services or offerings; as we improve our current services and offerings; and as technologies and laws change. It is our policy to post any changes we make to our Privacy Notice on our Site. Any changes will become effective upon our posting of the revised Privacy Notice on the Site. The date this Privacy Notice was last updated is identified below. If we make material changes to how we treat the personal information that falls within the scope of this Privacy Notice, we will notify you by email or through a prominent notice on the homepage of our Site.

## Contact Information

If you have any questions or comments about this Privacy Notice, how we collect, use, and share your personal information, and your choices and rights regarding such use, please contact us using our CCPA Request Form available at [www.symetra.com/ccpa](http://www.symetra.com/ccpa) or call our CCPA Hotline at 1-800-SYMETRA (796-3872), ext. 22216.

## Date Last Updated

We last updated this Privacy Notice on July 21, 2023.



Symetra Financial Corporation  
777 108th Avenue NE, Suite 1200  
Bellevue, WA 98004-5135  
[www.symetra.com](http://www.symetra.com)

Symetra® is a registered service mark of  
Symetra Life Insurance Company.