

EquiTrust Life Insurance Company

Privacy Notice for California Employees and Job Applicants

Effective Date: January 1, 2023

Last Reviewed On: June 7, 2023

This **Privacy Notice for California Employees and Job Applicants** (this “Notice” or “Policy”) supplements the information contained in other personnel disclosures and applies solely to employees or job applicants of EquiTrust Life Insurance Company (the “Company” or “we”) who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (the “CCPA”), as amended, and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Policy.

Information We Collect

We collect information from our employees and job applicants that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device (“personal information”). Personal information does not include publicly available information from government records, deidentified or aggregated consumer information, or personal information protected by certain other sector-specific federal or California statutes.

In particular, EquiTrust Life Insurance Company has collected the following categories of personal information from employees or job applicants within the last twelve (12) months:

Category	Examples of Personal Information Collected
Identifiers.	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.
Personal Information (as listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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.
Protected Classifications/Characteristics Under California or Federal Law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Geolocation Data.	Physical location or movements of company-owned devices.
Internet or Network Activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Professional or Employment-Related Information.	Current or past job history or performance evaluations.
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Non-Public Education Information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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.

The specific personal information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual.

Sources of Personal Information

EquiTrust Life Insurance Company obtains the categories of personal information listed above from the following categories of sources:

- Directly from you, such as on job applications, employee onboarding documentation, employee timekeeping and payroll documentation, and similar documentation;
- Indirectly from you, such as observing your interactions with company systems; and/or
- Third parties, such as from vendors used for background checks.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information, such as to apply for employment, to make payroll payments, or to administer benefits;
- To ensure compliance with law, regulation, policies, and procedures and to investigate and help prevent fraud;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- To help maintain the safety, security, and integrity of our systems, services, databases, and other assets;

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- As described to you when collecting your personal information or as otherwise set forth by law; and/or
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our employees or job applicants is among the assets transferred.

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

Retention of Personal Information

We will retain your information as long as it is reasonably necessary for each disclosed purpose, as outlined above.

Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. “**Business purpose**” means the use of personal information for the Company’s operational purposes, or other notified purposes, provided that the use of personal information shall be reasonably necessary and proportionate to achieve the operational purpose for which the personal information was collected or processed or for another operational purpose that is compatible with the context in which the personal information was collected. Under the CCPA, there are seven specific business purposes: auditing; security; debugging; short-term, transient use; performing services on behalf of the Company; undertaking internal research; and quality assurance and improvement.

We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

In the preceding twelve (12) months, Company has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below. Categories of personal information which were not disclosed to a third-party recipient are excluded.

Personal Information Category	Category of Third-Party Recipients
Identifiers.	Human Resources information service providers Financial investment service providers Insurance providers

	Payroll service providers Government entities
Personal Information (California Customer Records).	Human Resources information service providers Financial investment service providers Insurance providers Payroll service providers Government entities
Protected Classifications/Characteristics.	Human Resources information service providers Financial investment service providers Insurance providers Payroll service providers Government entities
Geolocation Data.	Information Technology service providers
Internet or Network Activity.	Information Technology service providers
Professional or Employment-Related Information.	Human Resources information service providers
Non-Public Education Information.	Human Resources information service providers
Inferences.	Human Resources information service providers

Sale of Personal Information

In the past 12 months, we have not “sold” personal information that is subject to the CCPA. For purposes of this Policy, “sold” means the disclosure of personal information to a third-party for monetary or other valuable consideration.

Your Rights and Choices

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

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the “right to know”). Once we receive

your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (a “[data portability request](#)”); and
- If we disclosed your personal information for a business purpose, a list of disclosures made for a business purpose which identifies the personal information categories that each category of recipient obtained.

We may deny your right to know request if one of the following exceptions apply:

1. The Company cannot verify your request;
2. The request is manifestly unfounded or excessive, or the Company has already provided personal information to you twice in a 12-month period;
3. If disclosure would restrict the Company’s ability to comply with legal obligations, exercise legal claims or rights, or defend legal claims; or
4. If the information consists of certain sensitive information, such as your social security number, financial account number, or account passwords.

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the “[right to delete](#)”). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, or take actions reasonably anticipated within the context of our ongoing employment or business relationship with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et seq.*);
6. Enable solely internal uses that are reasonably aligned with employee or job applicant expectations based on your relationship with us;

7. Comply with legal obligations, exercise legal claims or rights, or defend legal claims; and/or
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Right to Correction

You have the right to request the correction of any inaccurate personal information that we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information. We will use reasonable efforts to correct the inaccurate personal information as you may direct.

Right to Limit Use or Disclosure of Sensitive Personal Information

You have the right to limit the use and disclosure of your sensitive personal information, if we are using it beyond what is reasonable and proportionate to provide the requested goods or services.

Exercising Your Rights

To exercise your rights as described above, please submit a request by either:

- Calling us at 888-400-5759.
- Emailing us at HRCCompliance@EquiTrust.com.

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. To designate an authorized agent, please fill out the *California Authorized Agent Designation Form* and email it to HRCCompliance@EquiTrust.com.

You may only submit a request twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
 - An unexpired passport or U.S. identification card;
 - U.S. birth certificate;
 - Unexpired permanent resident card;
 - Certificate of naturalization;
 - Driver's license or identification card; and/or
 - Social security card.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to 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.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact 888-400-5759 or HRCCompliance@EquiTrust.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically Portable Document Format (PDF).

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; and/or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

You may exercise your rights under the CCPA without discrimination. EquiTrust will not retaliate against an employee, applicant for employment, or independent contractor for exercising CCPA privacy rights.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which EquiTrust Life Insurance Company collects and uses your information described here and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 888-400-5759

Email: HRCompliance@EquiTrust.com

Postal Address:

EquiTrust Life Insurance Company

Attn: Human Resources

222 West Adams Street, Suite 2150

Chicago, IL 60606

If you need to access this Policy in an alternative format due to having a disability, please contact HRCompliance@EquiTrust.com or 888-400-5759.

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