



# **SMS Privacy Statement**

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**EquiTrust Life Insurance Company**

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## **1.0 SMS Privacy Policy**

EquiTrust Life Insurance Company, its subsidiaries, affiliates and/or affiliated companies (the “Companies”) are committed to protecting your privacy. This Privacy Policy (the “Policy”) governs how we treat the Personal Information that we collect and receive from you in connection with your use of the SMS Service (“Service”), which we make available to you through a third-party service provider. This Policy is incorporated into the Terms of Service.

This Policy applies to individuals who receive SMS text messages from the Companies, including job applicants and candidates engaged in the hiring process and employees who voluntarily “opt in” to receive text messages for legitimate business purposes. These business purposes may include, but are not limited to, operational notifications, system or issue resolution, and business continuity or emergency communications.

By using the Service, you agree to the terms of this Policy. The Companies reserve the right, in their sole discretion, to modify or change this Policy at any time with or without prior notice to you. The effective date will be posted at the bottom of this Policy for your convenience. This Policy, and any changes, are effective as soon as posted. Your continued use of the Service following the posting of any changes to the Policy constitutes your full acceptance of those changes.

“Personal Information” is information that individually identifies you, such as your name, mobile phone number or user/screen name, as well as any Personal Information that you choose to provide when using the Service.

## **2.0 What Personal Information is collected about you**

Through the use of the Service, the Companies will receive the following information from our third party service provider: your mobile phone number when you send a text message to us, the text of messages that you send to other users of the Service, any user or screen name that you select in connection with the Service, as well as any comments or feedback regarding the Service that you send to us.

## **3.0 How The Companies use Personal Information about you**

We use Personal Information to (a) provide you with the Service, (b) process and respond to inquiries, (c) improve the Service, (d) if necessary, contact you with important announcements or messages, (e) conduct research, and (f) provide anonymous reporting for internal and external clients and partners.

Each message that you send through the Service (either to us or to other users of the Service) is stored on our servers. We retain these messages on our servers. The Companies utilize servers and services owned by third parties.

## **4.0 Disclosure of your information**

We will not rent or sell your Personal Information to other companies or individuals unless we have your consent. We may use or disclose such information in any of the following limited circumstances:

- We have your consent.
- We need to enforce our Terms of Service.
- We provide such information to trusted businesses or persons for the sole purpose of processing Personal Information on our behalf. When this is done, it is subject to

agreements that oblige those parties to process such information only on our instructions and in compliance with this Policy and appropriate confidentiality and security measures. If the third party fails to comply with our terms, the Companies are not accountable in any way for any liability or reimbursement.

- We provide such information to third parties who have entered into non-disclosure agreements with us.
- We provide such information to a company controlled by, or under common control with, the Companies for any purpose permitted by this Policy.
- We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights, or the legal rights of others, or defend against legal claims.
- We believe it is necessary to share Personal Information to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of the Companies Terms of Service, or as otherwise required by law.
- We transfer Personal Information about you if the Companies are, or its assets are, acquired by or merged with another company.

We may share aggregated information with others without further notice. An example of this would be the number of people who used the Service in a given month or the total number of texts sent in a given week.

## **5.0 Security**

The Companies take precautions to ensure the security of your Personal Information, including ensuring that our third-party service providers protect the security of your Personal Information. However, we cannot guarantee that hackers or unauthorized personnel will not gain access to your Personal Information despite our efforts. You should note that in using the Service, your information will travel through third party infrastructures which are not under our control (such as a third-party SMS delivery platform or your carrier network).

We cannot protect, nor does this Policy apply to, any information that you transmit to other users. You should never transmit personal or identifying information to other users.

## **6.0 Opting In**

A mobile user might opt-in by:

- Entering a phone number online or in an employment application,
- Sending a Mobile Originating (MO) message containing an advertising keyword,
- Filling out a paper form that includes their phone number,
- Agreeing to receive work-related SMS messages through an internal authorization process,
- Scanning a QR code and providing their phone number, or
- Signing up at a professional networking or career fair event.

## **7.0 Opting Out**

The Companies' third-party service provider gives you the ability to opt out of the Service for any reason. You can opt out by texting "STOP" or "QUIT" to the 10-digit long code phone number used to message you.

We reserve the right to send you certain communications relating to the Service, such as announcements and administrative messages, without offering you the opportunity to opt-out of receiving them.

### **8.0 Children**

The Service is not intended for children under 13, and the Companies do not knowingly collect information from children under the age of 13.

Children aged 13 or older should not submit any Personal Information without the permission of their parents or guardians. By using the Service, you are representing that you are at least 18, or that you are at least 13 years old and have your parents' permission to use the service.

### **9.0 Intended Audience**

The Companies require that users of this service be limited to US residents only.

### **10.0 Questions or Concerns**

For questions about this Policy or SMS privacy practices, please contact:

Phone: 888-400-5759

Email: [HRCompliance@EquiTrust.com](mailto:HRCompliance@EquiTrust.com)

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](mailto:HRCompliance@EquiTrust.com) or 888-400-5759.

Visit the following link to view our Terms of Service: <https://www.equitrust.com/media/1399/sms-terms-of-service.pdf>