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NASSAU CCPA EMPLOYEE PRIVACY POLICY

Effective Date: December 1, 2022

This Privacy Policy is provided on behalf of Nassau Financial Group, L.P. including Nassau Life Insurance Company, Nassau Life and Annuity Company, PHL Variable Insurance Company, Nassau Life Insurance Company of Texas and Nassau Life Insurance Company of Kansas (collectively, “**Nassau**” or “**we**”). Under the California Consumer Privacy Act (“**CCPA**”), as amended, businesses that collect the personal information of California residents have certain obligations, and California residents have certain rights related to their personal information. This Privacy Policy describes how Nassau meets those obligations and helps California residents exercise those rights, with respect to Nassau’s employees directors, officers, or contractors, including those individuals’ emergency contacts and beneficiaries, as applicable, and job applicants who are California residents (collectively, “**California employees**,” “**you**,” or “**your**”).

OVERVIEW OF THIS CALIFORNIA PRIVACY POLICY

The terms defined in the CCPA have the same meaning when used in this Privacy Policy. For example, for the purposes of this Privacy Policy, “**personal information**” is defined as 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 consumer or California household, and does not include publicly available information from government records, de-identified or aggregated information, or other regulated information that is excluded from the CCPA’s scope, such as personal information covered by the Fair Credit Reporting Act.

HOW WE COLLECT, USE, AND SHARE PERSONAL INFORMATION

Nassau collects personal information from California employees in different ways and for different purposes, as described further below. We explain below the categories of personal information we may collect and may have collected about California employees, the sources from which we may have collected that personal information, the purposes for which we may have used that personal information, and the third parties with whom we may have disclosed or shared that personal information.

CATEGORIES OF PERSONAL INFORMATION NASSAU MAY COLLECT OR MAY HAVE COLLECTED ABOUT CALIFORNIA EMPLOYEES

- **Identifiers**, such name, postal address, email address, social security number, driver’s license number, passport number, or other similar identifiers;
- **Professional or employment-related information**, such as previous employment, work history, and professional license;
- **Education information**, such as education or student records;
- **Characteristics of protected classifications**, such as age, race, color, ancestry, national origin, marital status, religion, sex, veteran or military status, medical condition, and mental or physical disability, and other demographic data;
- **Commercial information**, such as records of personal property;
- **Biometric information**, such as fingerprint or retina from which an identifier template can be extracted;
- **Internet or other electronic network activity information**, such as browsing history, search history, and information regarding your interaction with an internet website application;

- **Geolocation data;**
- **Audio, electronic, visual, thermal, olfactory, or similar information;**
- **Sensitive personal information,** such as:
 - Public record court information that might appear on a background check
 - Wage garnishments
 - QDRO's

PURPOSES FOR COLLECTION AND USE OF PERSONAL INFORMATION

We may collect, use, or disclose your personal information for purposes as described below:

- To perform employment-related functions, such as providing Human Resources services, administering payroll, compensation, reimbursement, insurance programs, managing professional development, enforcing employment agreements and Nassau policies;
- To recruit and evaluate job applicants, such as conducting background and reference checks, determining your eligibility as an employee;
- To comply with applicable laws and regulatory requirements, or as requested by government or regulatory authorities or law enforcement;
- To maintain the security and integrity of our systems, including maintaining internal records;
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;
- To consult with our attorneys, accountants and auditors;
- In connection with pending litigation;
- In connection with a merger, divestiture, acquisition, 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 is among the assets transferred.

SOURCES OF PERSONAL INFORMATION

The categories of sources from which we collect or receive personal information may include you, government entities and other sources, publicly available sources, credit agencies or bureaus, service providers or other third parties (e.g., if you provided a referral upon applying for a job with Nassau).

PARTIES TO WHOM WE MAY DISCLOSE PERSONAL INFORMATION

Your personal information may be disclosed to Nassau affiliate companies, business partners, service providers, contractors, government agencies, law enforcement, or other third parties.

NO SALE OF PERSONAL INFORMATION

Nassau does not sell or share the personal information (including sensitive personal information) of California employees.

RETENTION OF PERSONAL INFORMATION

Nassau will retain your personal information for a period that is reasonably necessary to fulfill the purposes listed above or as required or permitted by applicable laws.

CCPA RIGHTS FOR CALIFORNIA EMPLOYEES

The CCPA provides California employees with certain rights with regard to their personal information. This Section explains those rights. If you would like to exercise any of those rights, please see below for more information on how to submit a request.

- **RIGHT TO KNOW ABOUT AND ACCESS YOUR PERSONAL INFORMATION.** If you are a California employee, you may have the right to request that Nassau provide you with information regarding what personal information about you we have collected, used, disclosed, sold, or shared in the preceding twelve (12) months. You may only make a consumer request to know about or access your personal information twice within a twelve (12)-month period.
- **RIGHT TO DELETE YOUR PERSONAL INFORMATION.** If you are a California employee, you may have the right to request that Nassau delete certain of your personal information that we have collected about you. However, this right does not apply to any of your personal information that is subject to an exception under the CCPA or otherwise not required by the CCPA.
- **RIGHT TO CORRECT YOUR PERSONAL INFORMATION.** If you are a California employee, you may have the right to request that Nassau correct 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.
- **RIGHT TO OPT-OUT OF THE SALE OR SHARING OF YOUR PERSONAL INFORMATION.** If you are a California employee, you may have the right to opt-out of the sale or sharing of your personal information. As indicated above, though, Nassau does not sell or share the personal information of California employees.
- **RIGHT TO LIMIT USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION.** If you are a California employee, you may have the right to request that Nassau limit the use of your sensitive personal information. Under CCPA, this right does not apply if sensitive personal information is collected or processed without the purpose of inferring characteristics about you. Nassau does not collect or process your sensitive personal information for the purpose of inferring characteristics about you.

Nassau will not discriminate or retaliate against any California employee for exercising any of the rights described above.

HOW TO SUBMIT A REQUEST

If you are a California employee and would like to exercise any of the rights identified above, you may submit a request by either completing a request on nfg.com, sending an email to corporate.compliance@nfg.com or by calling us at 1-800-813-8180.

SUBMITTING A REQUEST THROUGH YOUR AUTHORIZED AGENT

If you are a California employee, you may have the option to designate an authorized agent to submit a request on your behalf, so long as the authorized agent has your written permission to do so and you have taken steps to verify your identity directly with us. If you would like to designate an agent, your agent must register as such with the California Secretary of State and submit a copy of this registration along with your consumer request to us. We may need to contact you directly to verify the request.

HOW WE VERIFY YOUR REQUEST

We cannot fulfill your request to provide you with, correct or delete your personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.

To verify your identity, we will ask that you provide the following information when you submit your request:

- Name
- Address
- Date of Birth
- Email Address

Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfill your request. If we cannot successfully verify your identity, we will inform you of that fact.

We will respond to your request within forty-five (45) calendar days. However, in certain circumstances, we may require additional time to process your request. We will advise you within forty-five (45) calendar days after receiving your request if such an extension is necessary and why it is needed. Any disclosures we provide will only cover the twelve (12)-month period preceding our receipt of your request. If we cannot fulfill your request, our response to you will also explain the reason why we cannot fulfill your request.

We do not charge a fee to process or respond to your consumer 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.

CONTACT FOR MORE INFORMATION

If you have any questions or concerns about this Privacy Policy or our privacy practices, or to request this Privacy Policy in another format, please contact corporate.compliance@nfg.com or 1-800-813-8180.