

**Last Updated: February 13, 2023**

This Privacy Policy (“**Policy**”) applies to the operations of Heritage Life Insurance Company, Professional Life & Casualty Company and U.S. Financial Life Insurance Company (collectively, the “**Company**,” “**we**,” “**our**,” or “**us**”) and describes our practices regarding information that we may receive from our individual customers and potential customers of our products (“**Customers**”) and from general visitors to the heritageli.com, usfli.com and plcinsurance.com websites (“**Website Visitors**”). By using our website, completing an application form, or otherwise providing any information to us, you are consenting to the collection, use, and disclosure of your information in accordance with this Policy and, as applicable, the Consumer Privacy Notice (as further described below). For purposes of this Policy, personal information does not include de-identified or aggregated information that does not identify you.

### **Personal Information Collected from Customers**

The Company offers various insurance products and we collect personal information from Customers when they apply for and/or purchase products from us and in connection with other insurance-related transactions (collectively, “**Insurance Personal Information**”). Because all Insurance Personal Information is subject to the Gramm-Leach-Bliley Act, this Policy does not apply to any Insurance Personal Information collected on the website (e.g., information collected as part of an application form) — rather, Insurance Personal Information is subject to our Consumer Privacy Notice, available for Professional Life & Casualty Company Customers at [plcinsurance.com/privacy](http://plcinsurance.com/privacy), and available for U.S. Financial Life Insurance Company Customers at [heritageli.com/privacy-usfl](http://heritageli.com/privacy-usfl). If you are a customer or potential customer of an insurance product that we offer, please consult the applicable Consumer Privacy Notice for more information regarding how we collect, use and share your Insurance Personal Information.

### **Personal Information Collected from Website Visitors**

We may collect certain personal information from our Website Visitors when they visit or browse our websites (such information, the “**Website Information**”), as described below. It is important to note that the types of personal information we collect will depend on each Website Visitor’s interaction with us.

### **What Information We Collect**

**We collect your contact information.** For example, we may collect your name, telephone number, street or email address, and other personally identifying information when you interact with the website or fill out a form to request information.

**We collect device information and website usage information.** When you visit the website, our servers may automatically collect information about your visit and your device. The information may include the date/time of your visit, your IP address, the webpages that you visited, time of visits, content viewed, ads viewed, the site(s), application(s), destination(s), or service(s) you arrived from, and other clickstream data.

## **How We Collect Your Information**

**We collect information directly from you.** You may provide information directly to us if you contact us through our website.

**We collect information about you from third parties.** We may receive information about you from third-party sites or services. We may also collect information from users of third-party sites who give us access to their profiles.

## **How We Use Your Information**

**We use information to contact you and respond to you.** We may use your information to respond to your questions and requests. We may also use your information to provide you with the information you have requested. We may use your information to otherwise communicate with you, including about new features, products, or services.

**We use information to improve our website and products.** We may use your information to improve our website and our products. We may use your information to help diagnose problems with our servers and to otherwise administer the website.

**We use information for security purposes.** We may use your information to detect security incidents; protect against malicious, deceptive, or illegal activity; and prosecute those responsible for that activity. We may also use your information to identify and repair errors that impair existing intended functionality.

**We use information to comply with laws.** We may use your information to comply with applicable laws and regulatory requirements.

## **How We Combine Information**

We may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third-party sites. We combine information collected across devices, such as computers and mobile devices. We also combine information we get from third parties with information we already have. Such combined information will be handled in accordance with this Policy.

## **How We Share Your Information**

We may share information with our parent, subsidiaries, and affiliates for the business purposes described in this Policy.

**We share information with our service providers.** We may share your information with trusted service providers that are providing services to us and acting on our behalf, such as consultants, professional advisers (such as attorneys, accountants and auditors), payment processors, identification verification providers, and data analytics providers.

**We share information with our business partners.** For example, we may share information with third parties (such as agents) when you enter your information into our website in order to provide products or services to you.

**We may share information with any successor to all or part of our business.** We may share information 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 other similar proceeding, in which personal information held by us is among the assets transferred.

**We will share information to comply with the law or to protect ourselves.** We may share information with government agencies, consumer reporting agencies, and other outside parties as permitted or required by applicable laws. For example, we will share information to respond to a court order or subpoena. We will share information if a government agency or investigatory body requests it. We may also share information if we are investigating potential fraud or as part of other legal proceedings, such as in connection with pending litigation.

We may share information for other reasons we may describe to you.

### **We May Transfer Your Information**

We may transfer your information to and from any state, province, country, or other governmental jurisdiction, and process it in the United States or elsewhere. We may maintain your information on servers and databases located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may be different and may not be as protective as your jurisdiction.

### **Information Security**

The Internet is not 100% secure and there is always some risk in transmitting information over the Internet. Therefore, we cannot promise you that your use of our website will be completely safe. In addition, standard email communications are not secure. Therefore, you should not transmit any sensitive information to us through email. We encourage you to use caution when using the Internet.

### **Children and Parents**

This website is not intended for use by children under the age of 13, and we do not knowingly collect information directly from children under the age of 13. If we discover that we have received information directly from a child under the age of 13, we will delete that information. If you are a parent or legal guardian and believe we have collected information directly from your child, you may contact our Compliance Team at 1-800-651-1800 (for Professional Life & Casualty Company) or 1-800-959-3894 (for U.S. Financial Life Insurance Company) to request that such information be deleted.

## **Links to Third-Party Sites**

Our website may contain third-party links, include third-party integrations, or offer a co-branded or third-party-branded service. Through these links, third-party integrations, and co-branded or third-party-branded services, you may be providing information (including personal information) directly to the third party, us, or both. You acknowledge and agree that we are not responsible for how those third parties collect, share, or use your information. Because we have no control over the privacy practices or content of these linked sites, we recommend that you carefully review the privacy policies of every third-party service that you visit or see, including those third parties you interact with through our website. Our website may also serve third-party content that contains their own cookies or tracking technologies. We do not control the use of those technologies.

## **Notification of Changes**

We reserve the right in our sole discretion to change, modify, add, or delete portions of this Policy. We will provide notice of such changes only by posting the updated Policy on our website and changing the “Last Updated” date listed above, by posting a notice on the website or by sending you an email. We encourage you to review our Policy each time you visit our website to see if it has been updated since your last visit. Your continued use of the website following our notice of any such changes constitutes acceptance of those changes.

## **Contacting Us**

If you have any questions about this Policy or our privacy practices, please contact us at 1-800-651-1800 (for Professional Life & Casualty Company) or 1-800-959-3894 (for U.S. Financial Life Insurance Company). You can also write us at:

Compliance Team  
227 West Monroe Street, Suite 3775  
Chicago, Illinois 60606

## **Privacy Notice for California Residents**

This Privacy Notice for California Residents (this “**Notice**”) has been adopted by us in light of the California Consumer Privacy Act of 2018 (the “**CCPA**”), as modified by the California Privacy Rights Act of 2020 (the “**CPRA**”) and supplements the Policy.

## **Scope of the CCPA**

This Notice applies solely to California residents. As discussed in detail below, the CCPA provides California residents the right to know what personal information the Company collects, sells, or discloses; the right to access their personal information; the right to correct their personal information; the right to limit our use of their sensitive personal information; and the right to request deletion of their personal information.

Personal information is defined by the CCPA 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 person (for example, name, address, telephone number, Social Security number, and driver's license number). It does not include anonymized, de-identified, or aggregated information.

However, the CCPA does not apply to all types of personal information, including information that we already protect under other laws, including the federal Gramm-Leach-Bliley Act (“**GLBA**”), the Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”), the California Confidentiality of Medical Information Act (“**CMIA**”) and the California Financial Information Privacy Act (“**CFIPA**”).

### **Collection, Use and Disclosure of Personal Information**

The Company's Privacy Policy explains the Company's information collection policies. It covers the types of information the Company collects, how that information is collected, and the sharing of that information.

In the past 12 months, we have collected the following categories of personal information relating to California residents. These categories are defined by California law. We do not necessarily collect all information listed in a particular category, nor do we collect all categories of information for all individuals. In addition, as mentioned in the “Scope of the CCPA” section, personal information which is governed by HIPAA, CMIA, GLBA and/or CFIPA is exempted from the CCPA.

We have shared information in each of the following categories with our affiliates and service providers for our business purposes within the last 12 months. We may also receive requests for information from regulatory authorities, our auditors and/or our insurers and legal advisors. If requested from such parties, we would share your personal information as appropriate. In the event we are acquired by or merge with another company, or otherwise undergo a change of control, we may also share each of the below categories as part of that transaction.

In the past 12 months, however, we have not “sold” or “shared” for “cross-context behavioral advertising” any personal information relating to California residents within the meaning of the CCPA. For purposes of this Notice, “sold” means the disclosure of personal information for monetary or other valuable consideration and “cross-context behavioral advertising” means targeted advertising based on personal information obtained from your activity across businesses, distinctly-branded websites, applications, or services, other than our websites and services with which you intentionally interact.

Category of Personal Information Collected	Sources	Purpose of Collection, Processing, and Disclosure	Third Parties to which Personal Information has been Disclosed
<p>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</p>	<p>From you directly, whether on our websites or in person, or in applications or questionnaire responses you submit in connection with one of our products or services or other business purposes.</p> <p>From others on your behalf, such as if you are a named beneficiary or associated with a product held by one of our customers.</p> <p>From our service providers.</p> <p>From public records or published databases.</p>	<p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p>	<p>The members of our affiliated group of companies insofar as reasonable to administer our company.</p> <p>Service providers that assist us in providing products and services to you, including the following activities:</p> <ul style="list-style-type: none"> <li>• Host our databases, infrastructure and websites;</li> <li>• Assist us with marketing and communications with our clients or potential clients;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with data security and privacy;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>

<p>Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, your 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, credit card number, debit card number, or any other financial information, medical information, health insurance information</p>	<p>From you directly, whether on our websites or in person, or in applications or questionnaire responses you submit in connection with one of our products or services or other business purposes.</p> <p>From others on your behalf, such as if you are a named beneficiary or associated with a product held by one of our customers.</p> <p>From our service providers.</p> <p>From public records or published databases.</p>	<p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p>	<p>The members of our affiliated group of companies insofar as reasonable to administer our company.</p> <p>Service providers that assist us in providing products and services to you, including the following activities:</p> <ul style="list-style-type: none"> <li>• Host our databases, infrastructure and websites;</li> <li>• Assist us with marketing and communications with our clients or potential clients;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with data security and privacy;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>
<p>Characteristics of protected classifications under California or federal law, including: familial status, disability, sex, national origin, religion, color, race,</p>	<p>From you directly, whether on our websites or in person, or in applications or questionnaire responses you submit in connection with one of</p>	<p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts,</p>	<p>The members of our affiliated group of companies insofar as reasonable to administer our company.</p>

<p>sexual orientation, gender identity and gender expression, marital status, veteran status, medical condition, ancestry, source of income, age, or genetic information</p>	<p>our products or services or other business purposes.</p> <p>From others on your behalf, such as if you are a named beneficiary or associated with a product held by one of our customers.</p> <p>From our service providers.</p> <p>From public records or published databases.</p>	<p>providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p>	<p>Service providers that assist us in providing products and services to you, including the following activities:</p> <ul style="list-style-type: none"> <li>• Host our databases, infrastructure and websites;</li> <li>• Assist us with marketing and communications with our clients or potential clients;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with data security and privacy;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>From you directly, whether on our websites or in person, or in applications or questionnaire responses you submit in connection with one of our products or services or other business purposes.</p> <p>From others on your behalf, such as if you are a named beneficiary</p>	<p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or</p>	<p>The members of our affiliated group of companies insofar as reasonable to administer our company.</p> <p>Service providers that assist us in providing products and services to you, including the following activities:</p> <ul style="list-style-type: none"> <li>• Host our databases,</li> </ul>

	<p>or associated with a product held by one of our customers.</p> <p>From our service providers.</p> <p>From public records or published databases.</p>	<p>marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p>	<p>infrastructure and websites;</p> <ul style="list-style-type: none"> <li>• Assist us with marketing and communications with our clients or potential clients;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with data security and privacy;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>
<p>Audio, electronic, visual, thermal, olfactory or similar information</p>	<p>From you directly, whether on our websites or in person, or in applications or questionnaire responses you submit in connection with one of our products or services or other business purposes.</p>	<p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p>	<p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p>

		<p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p> <p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p>	<p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p> <p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p>
Professional or employment-related information	From you directly, whether on our websites or in person, or in applications or questionnaire responses	Providing our products and services to you and activities related to our provision of such products and services,	The members of our affiliated group of companies insofar as

	<p>you submit in connection with one of our products or services or other business purposes.</p> <p>From others on your behalf, such as if you are a named beneficiary or associated with a product held by one of our customers.</p> <p>From our service providers.</p>	<p>including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Research and analysis purposes.</p> <p>Complying with a legal obligation.</p>	<p>reasonable to administer our company.</p> <p>Service providers that assist us in providing products and services to you, including the following activities:</p> <ul style="list-style-type: none"> <li>• Host our databases, infrastructure and websites;</li> <li>• Assist us with marketing and communications with our clients or potential clients;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with data security and privacy;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>
Education information	<p>From you directly, whether on our websites or in person, or in applications or questionnaire responses you submit in connection with one of our products or services or other business purposes.</p>	<p>Providing our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying</p>	<p>The members of our affiliated group of companies insofar as reasonable to administer our company.</p> <p>Service providers that assist us in providing products and services to you, including the following activities:</p>

	<p>From others on your behalf, such as if you are a named beneficiary or associated with a product held by one of our customers.</p>	<p>customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <p>Analyzing and amending our products and services.</p> <p>Research and analysis purposes.</p>	<ul style="list-style-type: none"> <li>• Host our databases, infrastructure and websites;</li> <li>• Assist us with marketing and communications with our clients or potential clients;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with data security and privacy;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>
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In addition to the categories of personal information above, we collect the below categories of *sensitive personal information* as defined under California law.

We have shared information in each of the following categories with our affiliates and service providers for our business purposes within the last 12 months. We may also receive requests for information from regulatory authorities, our auditors and/or our insurers and legal advisors. If requested from such parties, we would share your personal information as appropriate. In the event we are acquired by or merge with another company, or otherwise undergo a change of control, we may also share each of the below categories as part of that transaction.

We do not use your sensitive personal information for purposes other than those necessary to aid in protecting and securing your personal information and our systems, to verify or maintain the quality or safety of our services and systems, or as otherwise permitted under regulations or required by law. In the past 12 months, we have not “sold” or “shared” sensitive personal information within the meaning of California Law.

Category of Personal Information Collected	Sources	Purpose of Collection, Processing, and Disclosure	Third Parties to which Personal Information has been Disclosed
Social security, driver's license, state identification card, or passport number	<p>From you directly, in person, in applications or in connection with one of our products or services or other business purposes.</p> <p>From others on your behalf, such as if you are a named beneficiary or associated with a product held by one of our customers.</p> <p>From our service providers.</p>	<p>We use all or a subset of the personal information in this category:</p> <ul style="list-style-type: none"> <li>• To provide our products and services to you and activities related to our provision of such products and services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions and verifying customer information, processing payments.</li> <li>• For the prevention and detection of fraud, money laundering or other crimes.</li> <li>• When required to comply with a legal obligation.</li> </ul>	<p>The members of our affiliated group of companies insofar as reasonable to administer our company.</p> <p>Service providers that assist us in providing products and services to you, including the following activities:</p> <ul style="list-style-type: none"> <li>• Host our databases, infrastructure and websites;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>
Health information	From you directly, in person, or in applications or questionnaire responses you submit in connection with one of our products or services or other business purposes.	<p>We use all or a subset of the personal information in this category:</p> <ul style="list-style-type: none"> <li>• To provide our products and services to you and activities related to our provision of such products and</li> </ul>	<p>The members of our affiliated group of companies insofar as reasonable to administer our company.</p> <p>Service providers that assist us in providing products and services to</p>

	<p>From others on your behalf, such as if you are a named beneficiary or associated with a product held by one of our customers.</p> <p>From our service providers.</p>	<p>services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions and verifying customer information, processing payments, providing advertising or marketing services, or providing analytics services.</p> <ul style="list-style-type: none"> <li>• For the prevention and detection of fraud, money laundering or other crimes.</li> <li>• When required to comply with a legal obligation.</li> <li>• For research and analysis purposes.</li> </ul>	<p>you, including the following activities:</p> <ul style="list-style-type: none"> <li>• Host our databases, infrastructure and websites;</li> <li>• Assist us with marketing and communications with our clients or potential clients;</li> <li>• Assist us with the financial, regulatory and legal aspect of our business;</li> <li>• Assist us with the administration of our business.</li> </ul> <p>Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims.</p> <p>Courts or governmental entities where there is a binding obligation, whether legal or otherwise.</p>
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**Retention of Personal Information**

In general, we aim to keep personal information only for as long as necessary and only for the reason(s) we collected it. It may be necessary to keep personal information longer than our official retention periods for legal or regulatory reasons, including litigation.

We consider the following criteria when determining how long a particular record will be retained, including any personal information contained in that record:

- How long the record is needed to provide you with the products and services you request
- How long the record is needed to support and enhance our operational processes
- How long the record is needed to protect our rights and legal interests
- How long the record must be retained to comply with applicable laws and regulations

The same personal information about you may be included in more than one record and used for more than one purpose, each of which may be subject to different retention periods based on the factors listed above.

### **Personal Information of Minors**

We do not knowingly collect personal information directly from individuals under 16 years of age. We may collect personal information regarding individuals under 16 years of age from their parents or legal guardians, but only as necessary to provide our services.

### **Your Rights Under the CCPA**

The CCPA provides California residents with certain rights regarding their personal information. Below is a description of the rights the CCPA affords and how you may exercise those rights with the Company.

#### **Right to Access/Know**

You have the right to request information about the categories and specific pieces of personal information we have collected about you within the last 12 months, the categories of sources from which we collected your personal information, our business or commercial purpose for collecting your personal information, the categories of third parties with whom we have shared your personal information, and the business or commercial purpose for which we shared your personal information. You also have the right to know if we have sold or disclosed your personal information. Where possible, the information will be delivered in a readily usable format that allows you to transmit the information from one entity to another without any hindrance.

#### **Right to Correct**

You have the right to request we correct any mistakes in your personal information or update your preferences; we may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect; data solely retained for data backup purposes is generally excluded.

#### **Right to Request Deletion**

You have the right to request that we delete personal information we have collected from you. However, if it is necessary for the Company to maintain the personal information for certain purposes, including to provide services, the Company is not required to comply with your deletion request. The Company will inform you if it is unable to fulfill your deletion request and the reason why it cannot do so.

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

You have the right limit the use of and disclosure of your sensitive personal information the Company collects or maintains, to only those purposes necessary to provide our services (but we do not use sensitive personal information for any purpose that is not necessary to provide our services).

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

You have the right to opt-out of the sale of your personal information. We do not sell your personal information to or share your personal information with third parties for cross contextual advertising, nor do we intend to, as those terms are defined by California privacy law. We also have not done so for the last 12 months.

### **Right to Non-Discrimination**

You have the right to not be discriminated against for exercising any of the above-listed rights. We may, however, provide a different level of service or charge a different rate reasonably relating to the value of your personal information.

### **How to Submit a Request**

You or a person we can validate as being authorized by you may make a verifiable consumer request to exercise your rights discussed here by contacting the Company through one of the following methods:

- Filling out the California Consumer Privacy Act (CCPA) Request Form available at [plcinsurance.com/privacy](http://plcinsurance.com/privacy) (for Professional Life & Casualty Company) or [heritageli.com/privacy-usfl](http://heritageli.com/privacy-usfl) (for U.S. Financial Life Insurance Company) and mailing the completed form to us at Compliance Team 227 West Monroe Street, Suite 3775, Chicago, Illinois 60606.
- Calling 1-800-651-1800 (for Professional Life & Casualty Company) or 1-800-959-3894 (for U.S. Financial Life Insurance Company). Inform our customer service representative that you wish to submit a “Right to Access/Know” and/or a “Right to Correct” and/or a “Right to Request Deletion” request.

We understand the importance of protecting your personal information. This means that we will need to verify your identity in order to respond to your request. Therefore, we will ask you for certain information that will assist us in identifying who is making the request and confirm that the person making the request is really whom they say they are. If someone authorized by you makes a verifiable consumer request and provides a notarized copy of the authorization or an active power of attorney, we will provide the information. You may also make a verifiable consumer request on behalf of your minor child. The information provided to us to verify the request will be used solely for verification purposes and will not otherwise be maintained by the Company. Making a verified consumer request does not require you to create an account with us. Unless we specifically notify you otherwise, we will respond to all requests for information under the CCPA within forty-five days of the date we receive the request.

In the case that we are not able to verify the identity of the requestor based on the information provided to us upon the initial request, we will request additional information to help us complete the verification. We cannot respond to your request or provide you with personal information if we cannot both verify your identity or authority to make the request and confirm that the personal information that we have relates to you.

The CCPA limits you and your authorized agents to submission of two Right to Know requests within a twelve-month period. Right to Know Requests only cover personal information that we have collected within the preceding twelve months.

### **Notification of Changes**

We reserve the right in our sole discretion to change, modify, add, or delete portions of this Notice. We will provide notice of such changes only by posting the updated Notice on our website and changing the “Last Updated” date listed above, by posting a notice on the website or by sending you an email. We encourage you to review our Notice each time you visit our website to see if it has been updated since your last visit. Your continued use of the website following our notice of any such changes constitutes acceptance of those changes.