

GPM LIFE GROUP OF COMPANIES
CALIFORNIA PRIVACY NOTICE - NO RESPONSE REQUIRED
FOR CALIFORNIA RESIDENTS ONLY

The GPM Life Group of Companies includes Government Personnel Mutual Life Insurance Company and GPM Health and Life Insurance Company (“GPM”).

This notice describes GPM's privacy policy and how we treat the information we receive about you. This notice applies only to California residents (“consumer(s)”, also referred to as “you” or “your”) and is intended to comply with the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”), and any subsequent amendments and/or modifications. This CCPA Notice explains how GPM (collectively, “we” or “us”), collects, uses, retains, and discloses personal information related to California residents.

We collect and use information for business purposes 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 or device (“Personal Information”). We collect, use, and disclose Personal Information in compliance with applicable laws. Personal Information collected may be used in evaluating a request for our insurance or annuities, evaluating benefit claims, administering our products and processing transactions that you request. The categories of Personal Information that we may collect include:

- A) Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, telephone number, social security number, driver’s license number, passport number, date of birth, or other similar identifiers;
- B) Any categories of Personal Information described in Section 1798.80(e) of the CCPA;
- C) Characteristics of protected classifications under California or federal law (age, gender, race, nationality, disability, religion, sexual orientation, gender identity, disability);
- D) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- E) Biometric information;
- F) Internet or other electronic activity information;
- G) Geolocation data;
- H) Audio, electronic, visual, thermal, olfactory, or similar information;
- I) Professional or employment related information such as current or past job history;
- J) Non-public education information; and
- K) Inferences drawn from collected Personal Information to create a profile about a Consumer reflecting the Consumer’s preference, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

The information that we collect in connection with establishing eligibility with our products or services that Consumers apply for or obtain for personal, family, or household use is not subject to the requirements of the CCPA because such data is already protected under the Gramm-Leech-Bliley Act (“GLBA”), and the CCPA does not apply to such information. This requirements of CCPA also does not apply to the information processed pursuant to the Fair Credit Reporting Act (“FCRA”), nor to the protected health information processed pursuant to the Health Information Portability and Accountability Act (“HIPAA”).

We have collected the following categories of Personal Information from Consumers in the past twelve (12) months:

- A) 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;
- B) Any categories of Personal Information described in Section 1798.80(e) of the CCPA;
- C) Characteristics of protected classifications under California or federal law (age, gender, race, nationality, disability, sexual orientation, gender identity);
- D) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies; and
- E) Professional or employment related information such as current or past job history.

We have NOT sold any Personal Information about Consumers, including minors, in the past twelve (12) months.

We may disclose your Personal Information to the following third parties:

- Service Providers
- Our affiliates
- Governmental entities

We may disclose your Personal Information to a third party for the following business purposes:

- To allow others to provide services for us, such as evaluation requests for insurance or benefits.
- To allow others to perform administrative services for us.
- To allow others to process a transaction you request.
- To allow for auditing, accounting, actuarial, rating agency or research purposes.
- To allow the law or other agencies to help us prevent fraud.
- To allow those that process data for us.
- To reinsurers, other insurers, your agent and Consumer reporting agencies.
- To marketers to assist us in offering our products and services to you.
- To financial services with which we have a marketing agreement.

In the last twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

- A. Identifiers (name, address, social security number, driver's license number, email address, etc.)
- B. Personal Information Categories under CCPA Section 1798.80(e) (insurance policy number, bank account number, credit or debit card number).
- C. Protected classification information (age, gender, race, nationality, disability, sexual orientation, gender identity)
- D. Commercial Information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- E. Professional or employment related information such as current or past job history

Personal Information does not include publicly available information.

We get most of the personal information from you. The information that you give us when applying for our products gives us most of what we need. **If we need to check, or need more information, we may get it from others.** Others would be adult family members, employers, government agencies, and insurers. Others would also include consumer reporting agencies, doctors, hospitals, and other medical personnel.

We treat information as private. Our employees are required to protect the privacy of your information. Employees may get information only when there is a good reason, like to administer or offer our products.

We keep physical, electronic and procedural safeguards for your information. These safeguards comply with all laws. Employees are required to comply with our policies.

The California Consumer Privacy Act (The CCPA provides Consumers with certain rights regarding your Personal Information. You have the right to request that we disclose to you about how we collect and use your Personal Information. The categories of Personal Information collected are identified in this California Privacy Notice. We will verify your identity by asking you to confirm reasonable pieces of Personal Information. Upon your verifiable request from you or an agent authorized by you, we will disclose to you:

- The categories of Personal Information collected;
- The categories of sources from which Personal Information has been collected;
- Our business or commercial purpose for collecting Personal Information;
- The categories of Personal Information that have been shared with third parties for a business purpose;
- The specific pieces of Personal Information we have collected about you;
- If we disclosed your Personal Information for a business purpose we will, identify the personal information categories that each category of recipient obtained.

You have the right to request that we delete your Personal Information that we have collected. You, or an agent authorized to act on your behalf may submit a request to delete your Personal Information that we have collected. We will verify your identity by asking you to confirm reasonable pieces of Personal Information. After receipt of a verifiable request to delete your Personal Information, we will confirm with you that you do, in fact, wish to have your Personal Information deleted. We are **not** required to comply with your request to delete your Personal Information if it is necessary for us to maintain your Personal Information in order to:

- A. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- B. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- C. Debug products to identify and repair errors that impair existing intended functionality.
- D. Exercise free speech, ensure the right of another Consumer to exercise their free speech rights, or exercise another right provided for by law.
- E. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code S 1546 seq.).
- F. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the deletion may likely render impossible or seriously impair the research achievement, if you previously provided informed consent.
- G. Enable solely internal uses that are reasonably aligned with Consumer expectations based on your relationship with us.
- H. Comply with a legal obligation.
- I. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

You have the right to correct inaccurate Personal Information that GPM maintains about you. Types of errors may include errors in the spelling of your name, inaccurate phone numbers or address, incorrect email spelling, etc. You, or an agent authorized to act on your behalf may submit a request to correct your Personal Information that we have collected and maintained. We will verify your identity by asking you to confirm reasonable pieces of Personal Information. After receipt of a verifiable request to correct inaccurate Personal Information, we will confirm with you that you do, in fact, wish to have your Personal Information corrected.

Under the CCPA, you have the right to opt out of the sharing of your Personal Information with certain third parties for cross-text behavior advertising (i.e. certain targeted advertising/marketing activities). Under the CCPA, Consumers

have the right to direct a business that shares Personal Information about the Consumer to third parties to not share the Consumer's Personal Information. Accordingly, if GPM shares Personal Information for these marketing and advertising purposes, you have the right to opt-out of the sharing of Personal Information by either calling us toll free at 1-800-938-4765 or clicking on the following link: "[*Do Not Share My Personal Information*](#)". Upon clicking on the [Do Not Share My Personal Information link](#), you will be directed to our company's webpage where you can opt-out of the sharing your Personal Information. You may be asked basic questions in order to allow GPM to identify which information is related to you to verify your identity. If we ask for Personal Information to verify your identity, we can only use that information for this verification purpose. If we are unable to verify you based on the information you have provided and the information in our systems, we will advise you that we cannot complete your request based on an inability to verify you. This opt-out does not apply to disclosures we make to service providers, contractors, affiliates or other parties for business/operation purposes, including disclosures permitted under the Gramm-Leach-Bliley Act ("*GLBA*").

GPM does not sell Personal Information. GPM also does not have actual knowledge that it shares the Personal Information of Consumers under than sixteen (16) years of age.

If GPM uses or discloses sensitive Personal Information for reasons other than those set forth in Section 7027, subsection (m), you have the right to limit the use or disclosure of sensitive Personal Information by GPM.

You have the right not to be retaliated against by GPM for exercising privacy rights conferred by the CCPA, including when you are an applicant to an education program, a job applicant, a student, an employee, or an independent contractor.

To exercise your rights regarding your Personal Information as explained in this Section 10.8 above, please call toll free at 1-800-938-4765 or visit www.gpmlife.com.

We will not discriminate against you because you exercised any of your CCPA rights by:

- A. Denying goods or services to you.
- B. Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- C. Providing you with a different level or quality of goods or services.
- D. Suggesting that you will receive a different price or rate for goods or services or at a different level or quality of goods or services.
- E. We will not collect additional categories of Personal Information or use Personal Information for additional purposes without providing you with notice.

A copy of this California Privacy Notice is also posted online at www.gpmlife.com. If you are unable to access the notice online, you encounter difficulties when attempting to access the notice, or you have questions or concerns about this California Privacy Notice, please call toll free at 1-800-938-4765.

We reserve the right to change our privacy policies. If we do, we will give you the required notice.