

# GOVERNMENT PERSONNEL MUTUAL LIFE INSURANCE COMPANY (GPM)

## CALIFORNIA PRIVACY NOTICE - NO RESPONSE REQUIRED

**GPM believes in protecting the privacy and security of information we collect about you.** (By "you," we mean you, your family members and loved ones.) 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)") and is intended to comply with the California Consumer Privacy Act of 2018 (CCPA).

**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"). These purposes include evaluating a request for our insurance or annuities. They also include 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, 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.
- 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
- 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.

### **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
- 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 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 can 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 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 (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. 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 it has collected, the categories of sources from which personal information has been collected, the business or commercial purpose for collecting or selling personal information, the categories of personal information that have been shared with third parties for a business purpose, and the specific pieces of personal information we have collected about you.

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 delete your personal information if it is necessary for us to maintain your personal information in order to:

- 1) 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.
- 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 S 1546 seq.).
- 6) 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.
- 7) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- 8) Comply with a legal obligation.
- 9) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

To exercise your rights regarding your personal information as explained above, please call toll free at 1-800-938-4765 or visit [www.gpmlife.com](http://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.

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](http://www.gpmlife.com). If you are unable to access the notice online, or you encounter difficulties when attempting to access the 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.