



## Customer Privacy Notice

**Effective Date: March 1, 2022**

This Customer Privacy Notice applies to the United States operations of **Talcott Resolution Life Insurance Company, and its subsidiaries** (together referred to as "**Talcott Resolution,**" "**we**" or "**our**").

Talcott Resolution owns and administers life and annuity insurance products and also administers policies on behalf of other insurance companies ("**Third Party Administrator**"). This Customer Privacy Notice describes how we collect, disclose, and protect the Personal Information of policyholders ("**you**" and "**your**"). It applies to the following companies:<sup>1</sup>

### **Talcott Resolution Companies**

- American Maturity Life Insurance Company;
- Talcott Resolution International Life Reassurance Corporation;
- Talcott Resolution Life and Annuity Insurance Company;
- Talcott Resolution Life Insurance Company;
- Talcott Resolution Distribution Company, Inc.;
- Talcott Resolution Comprehensive Employee Benefit Service Company;
- Lombard International Administration Services Company, LLC; and
- LIAS Administration Fee Issuer LLC

### **Unaffiliated Companies (as Third Party Administrator)**

- Time Insurance Company<sup>2</sup>
- Union Security Insurance Company<sup>3</sup>;
- Union Security Life Insurance Company of New York<sup>4</sup>;
- John Alden Life Insurance Company;
- Hartford Life and Accident Insurance Company

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<sup>1</sup> This Customer Privacy Notice is provided on behalf of Talcott Resolution and the companies listed above to the extent required by the Gramm-Leach-Bliley Act and implementing regulations.

<sup>2</sup> Formerly known as Fortis Insurance Company

<sup>3</sup> Formerly known as Fortis Benefits Insurance Company

<sup>4</sup> Formerly known as First Fortis Life Insurance Company

The types of Personal Information we collect about you depend on the types of products and services we provide. The Personal Information we have about you may include:

- Name.
- Social Security number.
- Date of birth.
- Street address.
- E-mail address.
- Telephone number.
- Credit card, debit card, or banking information.
- Policy information.
- Claim information.
- Medical records, if applicable to your policy.
- Information about your illness, disability, or injury, if applicable.

If you file a new or renewal application, we may also collect personal financial information from you and third parties such as consumer-reporting agencies, including:

- Credit history.
- Income.
- Financial benefits.
- Policy or claim information.

We receive your Personal Information from:

- Your application.
- Your request to pay a claim.
- Your request to take action on your account.
- Your other communications with us.
- Your insurance agent, broker, or other authorized representative.
- Our policy administrators.

The reasons we collect Personal Information are to:

- Service your policy.
- Support our core business activities.
- Potentially engage in future marketing and sales activities.

If you provide Talcott Resolution (or our designee) with your wireless telephone number (such as your cell or VoIP number) or e-mail address, you will be giving us your consent to:

- Contact you at that number to service a policy or account, but not for marketing purposes;

- Use an automated dialing system to call or send you text or prerecorded messages in order to service your policy or account;
- Monitor or record your calls for quality control and training purposes; and
- Receive e-mail from Talcott Resolution.

We will not share your Personal Information for purposes unrelated to our everyday business without allowing you to "opt-out" or "opt-in" as required by law. We do not, and do not intend to, sell your Personal Information for any purpose.

To serve you and our business, we may share Personal Information about your transaction history, as allowed by law, with people and businesses that are affiliated with us, including:

- Insurance companies.
- Employees.

We may also share Personal Information, as allowed by law, with unaffiliated third parties for everyday business purposes. These may include:

- Third party administrators who help us provide service to policyholders.
- Your insurance agent, broker, and other authorized representative.
- Insurance companies for which we provide third party administrator services.
- Providers of business and technology services.
- Companies that help us with consumer surveys, branding, and marketing.

If we have Personal Information about your medical records, illness, disability, or injury, we will only share that information:

- With your written permission, or
- As allowed or required by law.

We strive to maintain the confidentiality and integrity of your Personal Information by:

- Using reasonable security safeguards to protect against unauthorized access or disclosure.
- Identifying our records that contain Personal Information.
- Restricting access to Personal Information to those people who need it for their job-related duties.

Employees and other authorized people may access Personal Information to:

- Respond to questions about and provide services to policies.

- Pay claims, including annuity and life insurance payments.
- Communicate with policyholders and their representatives about our policies and services.
- Underwrite policies.
- Provide business support services.

Employees who violate our Privacy Policy may be subject to discipline.

At the start of our business relationship, we will give you a copy of our current Customer Privacy Notice.

You will receive a copy of our updated Customer Privacy Notice once a year thereafter.

- We will continue to follow our Customer Privacy Notice after our business relationship with you is completed and as long as we retain your personal information for business records purposes or to comply with the law.

### **Additional Notice for California Consumers**

This section of our Customer Privacy Notice describes certain rights of consumers who reside in the State of California. For additional information about our privacy practices, please see the Talcott Resolution Privacy Policy, which is available on our website at [www.talcottresolution.com](http://www.talcottresolution.com).

**Right to Know.** California consumers have the right to request any of the following information regarding personal information collected by Talcott Resolution about the consumer or the consumer's household during the last twelve (12) months ("Right to Know"):

- Categories of personal information we collected.
- Categories of sources from which the personal information is collected.
- Business or commercial purpose for collecting or selling personal information.
- Categories of personal information sold or exchanged for value with a third party and categories of such third parties.
- Categories of personal information disclosed to a third party for a business purpose and categories of such third parties.
- Specific pieces of personal information collected about you (except for very sensitive personally identifiable information, which we will describe but not transmit).

The process by which we verify and respond to your requests is explained below under “How to Make a Verifiable California Consumer Request” and “How We Respond to a California Consumer Request.”

**Right to Delete.** California consumers have the right to request a business delete any personal information about the consumer that the business has collected from the consumer, subject to a range of exclusions permitted by law (“Right to Delete”). For example, a business is not required to delete personal information if it is necessary to complete a transaction, is reasonably used for an ongoing business relationship, or is used internally in a lawful manner that is compatible with the context in which the consumer provided the information.

Once we receive and verify your request, we will separately confirm your request and follow appropriate procedures to verify the identity and authority of the person submitting the request. If the Right to Delete request is confirmed and verified, we will delete (and direct our service providers to delete) the requested personal information from our records, unless an exclusion applies. If we are unable to fulfill all or part of your request, we will let you know why (for example, if we have a permitted reason to retain certain information, or if the identity of the requesting person cannot be verified).

The process by which we verify and respond to your requests is explained below under “How to Make a Verifiable California Consumer Request” and “How We Will Respond to a California Consumer Request.”

**No Sales of Personal Information.** California consumers have the right to direct a business not to sell their personal information to others. In the preceding twelve (12) months, Talcott Resolution has not made sales of personal information for monetary or other consideration and has no present plans to do so. We share personal information with third parties for the business purposes described above and in the section of our Privacy Policy titled, “WHEN WE SHARE PERSONAL INFORMATION.”

**Designating an Authorized Agent.** California consumers may designate an authorized agent to act on their behalf to submit a Right to Know or Right to Delete request, or (if applicable) a request to opt-out from the sale of their Personal Information. An authorized agent may be a natural person or a business entity registered with the Secretary of State. An authorized agent must also submit to Talcott Resolution written proof of their authorization to act on the consumer’s behalf.

**How to Make a Verifiable California Consumer Request.** California consumers may submit a request to exercise any of their rights described above using the following methods:

Phone: Please call our Annuity Contact Center at 1-800-862-6668, Monday through Thursday, 8:00 a.m. to 7:00 p.m., or Friday, 9:15 am. to 6:00 p.m., Eastern Time.

Postal mail: Talcott Resolution  
Attn: Consumer Privacy Request  
1 Griffin Road North, Windsor, CT 06095

Please note that in order for us to verify certain requests we may need to verify your identity and California residency by confirming information we have on file for you, including email address, phone number, full name, address, and other personal information. If you make a request on behalf of someone else, we will need to verify your authority to make that request. We reserve the right to deny a consumer request if the identity or authority of the requesting party cannot be confirmed.

**How We Respond to a California Consumer Request.** We will confirm receipt of your Right to Know or Right to Delete request within ten (10) business days and may request additional information necessary to verify that you are permitted to make the request. We will respond to any verifiable consumer request within forty-five (45) calendar days of receiving it, subject to delays and exclusions permitted by law. If we require more time to respond, we will let you know the reason why and the extension period in writing. We will use the email address or U.S. Postal address you provided to us when making the request.

If we cannot comply with all or part of your request, we will explain the reasons why. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information readily from one entity to another entity.

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

**Protection from Discrimination.** California consumers have a right not to receive discriminatory treatment by the business for exercising the privacy rights conferred by the California Consumer Privacy Act. As such, we will not

discriminate against a California consumer for exercising any of the rights described in this section. This means that except as legally permitted we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.