

# Privacy

## Security Benefit Privacy Statement

**Effective Date: January 1, 2020**

### **Your privacy is important to us.**

At Security Benefit (Security Benefit Life Insurance Company, Security Benefit Corporation, Security Distributors, LLC, First Security Benefit Life Insurance and Annuity Company of New York, and Security Financial Resources, Inc.), we understand that the information you provide to us or that we collected about you is private and personal.

This privacy policy is provided to you so that you will understand what information Security Benefit collects about you, how we use and share the personal information we collect about you, including through our website, the choices you have about our collection, use and sharing of your personal information, and the measures we take to protect your privacy.

### **What types of information does Security Benefit collect, store and use?**

We collect, store and use various types of nonpublic personal information about you. The types of personal information we collect, store and use depend on the product and service you apply for or obtain from us and whether you visit our website.

We collect your personal information when you transact directly with us or one of our affiliates (for instance, when you visit our website or other online portal or mobile application, apply for an insurance product, call us, make a payment or withdrawal, or file a claim). We also collect information about you indirectly (for instance, from our independent producers/agents, our affiliates, your financial advisers, and your employer or group if you are a participant in a group policy) and from third parties (for instance, from consumer reporting agencies, government agencies and our service providers and data brokers).

We collect, store and use personal information about you such as:

- **Personal identifiers:** your name, postal address, email address, telephone number, governmental identification number such as social security number, passport number or military identification number, online identifier, Internet Protocol address, driver's license number or similar identifiers, and the name and some identifiers about your spouse, children and beneficiaries.
- **Sensitive information protected by federal or state law:** your age, gender, race, marital status, national origin, or ethnicity or disability.
- **Professional or employment information:** your job title, job history, income
- **Financial information:** your account numbers, credit and debit card numbers in combination with a security or access code, account balances, transaction history, credit and payment history, assets and liabilities, including records of personal property ownership.
- **Educational information not publicly available:** your level of education and schools attended, your degrees
- **Medical and health information:** your medical history, medical treatment and diagnosis by a health care professional (see also our [Health Privacy Policy](#) on our website or mobile app)

- **Life, health and other insurance information:** information about other insurance policies you may own
- **Unique biometric information:** fingerprints, retinal scans, photos used for facial recognition and genetic information and voice signatures
- **Geolocational data:** If you share your location in your online profile, we will collect that information. We may also determine location by using other data from your online and mobile devices.
- **Internet or other electronic network activity information:** browsing history, search history, and information about your interaction with a website, online application and advertisement
- **Information from consumer reporting agencies:** information from consumer reporting agencies about your medical and health information, credit reports, criminal offenses and convictions, consuming histories or tendencies, and driving record and information from various anti-fraud databases related to you.
- **Inferences drawn from any of the above to create a profile of you:** information about your consumer preferences, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

## Website and Mobile App Users

### If you use our website or mobile app:

- We and our third party service providers may use a variety of technologies that automatically collect and store certain information whenever you visit or interact with the website (or app) based on your use of the website (or app). This information may use technologies that are downloaded to your personal computer, browser, tablet, mobile phone, watch or other device whenever you visit the website (or mobile app). Please see our Cookie policy below for more information.
- We may supplement the information we collect directly from you with outside records from third parties in order to enhance our ability to serve you, to tailor content to you and to offer you additional content and marketing.

### How do we use your personal information?

We use your personal information to provide you with an insurance quote, to administer your policies, to market our products to you and for the following purposes:

- To consider your application for insurance, assess and evaluate institutional risk and provide you with an insurance product, where applicable;
- To administer your insurance product and maintain your account, including processing premium payment, processing claims, administering benefits and paying out withdrawals, surrenders and claims settlements, and encouraging customer engagement;
- To provide account statements and other required documents;
- To respond to court orders and legal investigations or as otherwise required or permitted by federal and state law;
- To report to consumer reporting agencies;
- To authorize, settle and clear the collection of amounts charged, debited or otherwise used to pay premium or receive payments and the audit of such information;
- To prevent and detect security incidents, fraud, money laundering, unauthorized access, data destruction and other crimes;
- To obtain reinsurance, or stop loss or excess loss insurance on our operations;
- To improve our products and technology, carry out market research, perform data analytics, risk modeling and statistical analysis and for mergers and reorganizations;
- For marketing and analytic purposes

### How and when do we disclose your personal information to other parties?

We do not sell personal information about current or former customers to any third parties. We may allow third-party advertising cookies to be placed on your computer or mobile device when you visit our website. You may opt-out of third-party cookies. For instructions on how to opt-out of third party cookies, go to the section on “How can I control cookies?”

- **Our affiliates:** We disclose your personal information, including information about your transactions and experiences, with other Security Benefit affiliated companies in order to assist in the delivery of services to you. They may use your information for marketing purposes, except for California customers and as explained below.
- **Third parties providing services to us or on your behalf:** We share your personal information with third parties that provide services to us or on our behalf, such as technical support, third party administration, marketing expertise and analysis, hosting services and website analytics (“service providers”). We do not allow service providers to use our customer information for their own marketing or other purposes. We contractually require any person or organization providing products or services on our behalf to protect our customer information and not use it except for the purpose for which they received it from us.
- **Joint marketing arrangements:** We share your personal information with companies, such as broker-dealers and insurance producers/agents, in order to market our products and to provide a broader range of products and services to you.
- **Reinsurers:** We disclose your personal information to our reinsurers in order to assist us in managing our business. Persons acting in a fiduciary or representative capacity or holding a legal or beneficial interest relating to the consumer.
- **Consumer reporting agencies:** We share your personal information with consumer reporting agencies during the underwriting process and at other times, as required by law.
- **Your health and medical information and related consumer reports:** We do not share your medical information, health insurance information or other health information we receive from any source, including consumer reporting agencies, with any of our affiliates or any other company, unless you expressly authorize it or it is permitted or required by law.
- **Your credit scores, motor vehicle records and other non-health consumer reports:** We do not share this information with other Security Benefit affiliated companies for marketing purposes. In the future, if we share this data with our affiliates for marketing purposes, we will provide you with the right to opt-out of such information sharing.
- **Judicial, regulatory and law enforcement bodies:** We may disclose your personal information to judicial, regulatory or law enforcement bodies, including auditors and examiners hired by the state, in order to:
  - Comply with any applicable law, regulation, subpoena, governmental request or legal process;
  - Protect and defend our rights and those of our affiliates and service providers, including investigations of potential violations of our rights and where it advisable for us to do so;
  - Detect, prevent or address fraud and other illegal activity, including security breaches.
  - Persons that assess our compliance with industry standards and requirements, guaranty funds, insurance rate advisory organizations, and our accountants, attorneys and auditors.

### **How do I get answers to my privacy questions?**

If you have questions about this privacy policy, please:

- Write us at: Security Benefit, One Security Benefit Place, Topeka, Kansas, 66636-0001, Attn: Chief Compliance Officer
- Call us at: 800.888.2461
- Email us at: [privacy.inquiry@securitybenefit.com](mailto:privacy.inquiry@securitybenefit.com)

### **Does this website/mobile application include third party content and links to third party websites/mobile apps?**

This website/mobile app may contain content that is supplied by a third party, and those third parties may collect usage information and your device identifier when you land on their webpages/mobile app. In addition, you may be directed to other websites or apps that are operated and controlled by third parties, who may collect your personal information. We are not responsible for the data collection and privacy practices employed by any of these third parties or their websites and apps. These other websites or apps may associate their tracking technologies with you and independently collect information about you. You should exercise caution and review the third party privacy policies when you leave our website or our app.

## **Children/Minors**

The Site is a general audience site and it is not directed to minors under the age of 18. We do not offer products to minors under the age of 18 or knowingly collect personal information from users in this age group. No one under the age of 18 should submit or post personal information through our online services. We may collect information regarding individuals under 18 years of age from their parents or legal guardians, but only as necessary to provide our products and services.

## **Security**

We maintain technical, physical, and administrative security measures designed to protect the security of your personal information against loss, misuse, unauthorized access, disclosure, or alteration. Some of the safeguards we use are firewalls, data encryption, physical access controls to our data centers and information access authorization controls. We require companies that work for us to protect your information. These measures are designed to provide a level of security appropriate to the risks of collecting, using and retaining your personal information.

## **Changes to this Privacy Policy**

We reserve the right to change this privacy policy at any time. If we make a material change to this privacy policy, we will post the revised privacy policy to the Security Benefit website as of the effective date of such changes.

## **Our Cookie Policy**

### **What are cookies?**

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by online service providers in order to make their websites or services work more efficiently, as well as to provide reporting information and to share information.

Cookies that are set by the website owner or service provider (in this case, Security Benefit) are called “first party cookies”. Cookies set by parties other than the website owner are called “third party cookies”. Third party cookies enable third party features or functionality to be provided on or through the website or service you are using (such as advertising, interactive content and analytics). The third parties that set these third-party cookies can recognize your computer both when it visits the website or service in question and also when it visits certain other websites or services.

### **Why do we use cookies and other tracking technologies?**

We use first party and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our websites, applications (“apps”) and services to operate, and we refer to these as “essential” or “strictly necessary” cookies. Other cookies enable us and the third parties we work with to track and target the interests of visitors to our websites

and apps, and we refer to these as “performance” or “functionality” cookies. For example, we use cookies to tailor content and information that we may send or display to you and otherwise personalize your experience while interacting with our websites and apps and to otherwise improve the functionality of the services we provide. We also enable third parties to serve cookies through our websites and apps and services for advertising, analytics, and other purposes. This is described in more detail below.

## **Cookies served through our website and app**

### **Strictly Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not work if you do block these cookies. These cookies do not store any personally identifiable information.

### **Performance Cookies**

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous.

### **Functional Cookies**

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages.

### **Targeting Cookies**

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device.

### **Targeted online advertising**

We have engaged one or more third party service providers to track and analyze both individualized usage and volume statistical information from interactions with our Websites. We also partner with one or more third parties (such as advertisers and ad networks) to display advertising on our Websites and/or to manage and serve advertising on other sites.

These third parties use cookies, web beacons, pixel tags and similar tracking technologies to collect and use certain information about your online activities, either on our Websites and/or other sites or mobile apps, to infer your interests and deliver you targeted advertisements that are more tailored to you based on your browsing activities and inferred interests (“Interest Based Advertising”). For more information about this practice, visit: [aboutads.info/choices](http://aboutads.info/choices)

Our third-party service providers may also use cookies or web beacons to collect information about your visits to our Websites and/or other sites to measure and track the effectiveness of advertisements and our online marketing activities (for example, by collecting data on how many times you click on one of our ads). The information collected by these third parties does not include personal information that enables you to be specifically identified (e.g. by reference to your name or email address).

### **How can I control cookies?**

You have the right to decide whether to accept or reject cookies.

- **Website Cookie Preference Tool:** You can exercise preferences about what cookies are served on our Websites by visiting the TRUSTe preference center by visiting: [preferences-mgr.truste.com](https://preferences-mgr.truste.com)
- **Browser Controls:** You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Websites though your access to some functionality and areas of our Websites may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.
- **Disabling Most Interest Based Advertising:** Most advertising networks offer you a way to opt out of Interest Based Advertising. If you would like to find out more information, visit: [aboutads.info/choices](https://aboutads.info/choices) or [youronlinechoices.com](https://youronlinechoices.com)
- **Mobile Advertising:** You can opt out of having your mobile advertising identifiers used for certain types of Interest Based Advertising, including those performed by us, by accessing the settings in your Apple or Android mobile device and following the most recent published instructions. If you opt out, we will remove all data about you and no further data collection or tracking will occur. The random ID we (or our third party partners) had previously assigned to you will also be removed. This means that if at a later stage, you decide to opt-in, we will not be able to continue and track you using the same ID as before, and you will for all practical purposes be a new user to our system.

## Do Not Track Signals

Various third parties are developing ways for consumers to express their choice about the collection of the individual consumer's online activities over time and across third-party websites or online services. We do not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

## California customers

California customers have the right to access and correct the personal information we have collected about them so that we can provide them with an insurance or financial product or service. This right does not apply to personal information we have collected that relates to a claim or legal case. To exercise your right, please write us at: Chief Compliance Officer, One Security Benefit Place, Topeka, Kansas 66636-0001. We do not share your personal information with our affiliates so that they can market their products and provide services to you.

The California Consumer Privacy Act (CCPA) gives California residents certain privacy rights with respect to some of the personal information we collect. We describe those rights and the steps a California resident must take to exercise those rights in our [CCPA privacy policy](#). View our [CCPA privacy policy](#).

## Privacy

- [GLBA Privacy Policy](#)
- [Health Information Notice](#)