

# **RELIANCE STANDARD**

A MEMBER OF THE TOKIO MARINE GROUP

**RELIANCE STANDARD LIFE INSURANCE COMPANY  
FIRST RELIANCE STANDARD LIFE INSURANCE COMPANY**

**PRIVACY POLICY**

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This Privacy Policy is in effect for Reliance Standard Life Insurance Company and First Reliance Standard Life Insurance Company (collectively “Reliance Standard”)

**Purpose**

Reliance Standard takes the privacy of our customers very seriously and is committed to protecting their privacy. This policy explains how Reliance Standard collects, uses and transfers personal data. The privacy program is designed to protect all Non-Public Information on customers and claimants against unauthorized use or disclosure.

**Definitions**

Non-Public Information (NPI)

NPI, means any information that is not publicly available and includes:

1. Any Reliance Standard business information (e.g., financial information, claim data, client data, client lists, contracts, vendor lists, sales/marketing data, intellectual property, information security data, policies/procedures, etc.)
2. Any information that is not publicly available, that when combined together can be used to identify an individual, such as social security number, first & last name, e-mail address, or claim information.

Any information or data, except age or gender, in any form or medium created by or received from a healthcare provider.

Personally, Identifiable Information (PII)

As defined by the National Institute of Standard and Technology (NIST). PII is defined as a person’s first name or first initial and last name in combination with one or more of the following data elements:

- Social security number
- Date of Birth
- Address

Protected Health Information (PHI)

As defined by the Health Insurance Portability and Accountability Act (HIPAA). PHI is defined as any “individually identifiable” information that is stored by a covered entity, and related to one or more of the following:

- Past, present, or future physical or mental health condition of an individual.
- Provision of health care to an individual.
- Past, present, or future payment for the provision of health care to an individual.

PHI is considered “individually identifiable” if it contains one or more of the following identifiers:

- Name
- Address smaller than state including street address, city, county, precinct, or zip code
- Dates related to an individual including birth, admissions, discharge, and death date
- Telephone/Fax numbers
- Electronic mail addresses
- Social security numbers
- Medical record numbers

- Health plan beneficiary numbers
- Account numbers
- Certificate/license numbers
- Device identifiers and serial numbers
- Biometric identifiers, including finger and voiceprints
- Full Face photographic images and any comparable images
- Any other unique identifying number or characteristic that could identify an individual

If the health information does not contain one of the above referenced identifiers and there is no reasonable basis to believe that the information can be used to identify an individual, it is not considered as PHI.

#### Personal Information:

For purposes of this policy, the term "Personal Information" shall have the same definition as "Nonpublic personal information" as defined by the Gramm-Leach-Bliley Act ("GLBA"). "Nonpublic personal information" generally is any information that is not publicly available and that: a consumer provides to a financial institution to obtain a financial product or service from the institution; results from a transaction between the consumer and the institution involving a financial product or service; or a financial institution otherwise obtains about a consumer in connection with providing a financial product or service. Personal Information may include NPI, PII, or PHI.

A majority of Reliance Standard's group insurance policies are self-administered policies. The group policyholder maintains all personal information on the individuals insured under the policy. The personal information is only relayed to and collected by Reliance Standard when a claim is filed or an application for coverage is received.

#### California Personal Information

"California Personal Information" refers to any personal information collected by Reliance Standard that is subject to California privacy law. This excludes any personal information regulated by Title V, Subtitle A of the GLBA.

#### Privacy Notice

"Privacy Notice" refers to the current version of Reliance Standard's Privacy Notice found at RSLI.com.

#### Privacy Notice for California Residents

"Privacy Notice for California Residents" refers to the current version of Reliance Standard's Privacy Notice for California Residents found at RSLI.com.

#### **Compliance with Privacy Laws**

Reliance Standard, as an insurance company, is subject to the GLBA, which governs the treatment of non-public personal information by financial institutions and is meant to protect the privacy and integrity of this information that a covered entity has in its possession. Reliance Standard complies with the GLBA and other state privacy laws by following the privacy practices contained in this policy, which includes distribution of our Privacy Notice regarding our information sharing policies and maintaining an Information Security Program.

## **Privacy Compliance Officer**

Reliance Standard has designated Charles Denaro, Vice President, Secretary, and Deputy General Counsel, as its Privacy Compliance Officer. The duties of the Privacy Compliance Officer include monitoring Reliance Standard's compliance, overseeing the adequacy of training for employees, and communicating with the appropriate parties regarding privacy issues. In addition, the Privacy Compliance Officer will have direct responsibility for the implementation and updating of privacy policies and procedures.

In the event that the Privacy Compliance Officer is no longer able to serve in that position, Reliance Standard shall designate a new Privacy Compliance Officer.

## **Information That We Collect and How We Use It**

### *Collection of information*

All Personal Information is collected and used for the business purpose of providing a service and/or fulfilling a contractual obligation under an insurance or annuity contract issued by Reliance Standard.

### *Sources of Consumer Personal Information*

Customers are the most important source of Personal Information, but we may also collect or verify information from:

- (1) Publicly available information;
- (2) Group Policyholders;
- (3) Insurance agent servicing your policy;
- (4) Physicians;
- (5) Health care providers;
- (6) Employers;
- (7) Other insurers to which a consumer has applied;
- (8) Consumer Investigative Organizations, or
- (9) Research/Analytical companies

### *Use of information*

We may use and disclose the Personal Information we collect for one or more of the following business purposes:

- (1) To set up a new client;
- (2) To provide an insurance quote;
- (3) To accept payments;
- (4) To communicate about a policy;
- (5) To renew a policy;
- (6) To obtain reinsurance for a policy;
- (7) To make an underwriting decision;
- (8) To process insurance and reinsurance claims;
- (9) For general insurance administration purposes to assist in performance of our contractual obligations under a policy;
- (10) To comply with our legal and regulatory obligations;
- (11) To model our risks;

- (12) To develop new products to offer to customers;
- (13) To defend or prosecute legal claims; or
- (14) To investigate or prosecute fraud.

#### *Sharing of Information*

Reliance Standard may disclose Personal Information to a service provider or third party for a business purpose. When we disclose Personal Information, we request that the recipient both keep that Personal Information confidential and not use it for any purpose except performing the service. We share Personal Information with the following categories of entities:

- (1) Parties to whom a consumer has directed or authorized disclosure;
- (2) Our group companies;
- (3) Service providers;
- (4) Group policyholders/employers to determine claimant eligibility;
- (5) Research/Analytical Companies;
- (6) Consumer Investigative Organizations;
- (7) Competent law enforcement bodies, regulatory agencies, government agencies, courts or
- (8) Other third parties where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect a consumer's vital interests or those of any other person;

### **Security Safeguards**

#### *Classification and Handling*

Non-Public Information (NPI), Personally Identifiable Information (PII) and Protected Health Information (PHI) will be classified and handled as a Tier 1 Confidentiality/Restricted and/or Tier 2 –Internal Private.

#### *Privacy and Security Awareness Training*

All Reliance Standard staff will complete privacy and security awareness training to ensure NPI is handled in accordance with Reliance Standard information security procedures.

#### *Encryption*

Data in Transit and Data-at-rest which contains NPI, PII and PHI must be protected by encryption, or by a documented compensating control which is approved and annually reviewed by the Chief Information Security Officer.

### **Record Retention**

All Reliance Standard records are subject to our Record Retention Policy, which must be consulted prior to information disposal. The Company's policy regarding record retention is consistent with the legal requirements.

## **Privacy Notices**

The Privacy Notice is sent to customers, as defined by Title V, Subtitle A of the Gramm-Leach-Bliley Act (“GLBA”), at the time of inception of the customer relationship and on an annual basis thereafter. The Privacy Notice describes Reliance Standard’s policies and practices with respect to collecting and sharing Personal Information. When RSL does not maintain personal information on a customer, the Privacy Notice is also provided to all group policyholders to be shared with the individual covered under the policy.

The California Privacy Law grants certain special rights to California residents and RSL provides a supplemental Privacy Notice for California residents.

These privacy notices may be updated and changed from time to time. We will post any new policies at RSLI.com.

## **California Privacy Law**

### *Information covered by California privacy law*

California privacy law grants special rights to California residents. Personal Information may already be protected by GLBA as well as other laws such as the California Financial Information Protection Act; the Health Insurance Portability and Accountability Act (HIPAA); the Fair Credit Reporting Act (FCRA); and/or the Driver's License Protection Act. California privacy law does not apply to information already protected under these laws but may apply to some California Personal Information collected by Reliance Standard. In addition to the privacy practices listed above, California residents are entitled to the following rights and disclosures.

### *Privacy Notice*

In addition to our Privacy Notice, Reliance Standard posts a supplemental Privacy Notice for California Residents on our website which contains all rights specific to California residents that are not contained within our Privacy Notice.

### *California resident Rights to California Personal Information*

1. The right to know what personal information is collected, used, shared or sold, both as to the categories and specific pieces of personal information;
2. The right to delete personal information held by businesses and by extension, a business’s service providers;
3. The right to opt-out of the sale of personal information.
4. The right to non-discrimination when a consumer exercises a privacy right under California privacy law.

### *Collection of information*

Under California privacy law, Reliance Standard must disclose the categories and specific types of information collected in the past 12 months. For purposes of this section, the terms used below have the same meanings as defined under California privacy law. Reliance Standard has collected the following categories and specific types

of Personal Information about consumers in the past 12 months: identifiers; personal information categories listed in the California resident records statute (Cal. Civ. Code § 1798.80(e)); protected classification characteristics under California or federal law; Sensory data; and Employment data.

*Request for Access to Specific Information, Data Portability Rights*

California Civil Code Section 1798.93 permits California residents to request information about the collection and disclosure of their California Personal Information over the past 12 months. Reliance Standard endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, but not more than ninety (90) days, we will inform the consumer of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt and is only applicable to California Personal information. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

*Verification of person making the request*

An individual making a request will need to provide information to us to verify that he/she is legally entitled to the information requested.

*Request for Deletions*

A California resident may have the right to ask Reliance Standard to delete a piece of California Personal Information collected. Reliance Standard may deny a request for any California Personal Information that falls under an exemption permitted by applicable California or Federal law.

*Submitting Requests*

If a California resident wishes to exercise his or her rights under California privacy law, Reliance Standard has dedicated telephone line and email inbox to these requests. A California resident may write to us at:

Privacy Officer  
Attn: California Privacy Rights  
Reliance Standard Life Insurance Company  
1700 Market Street, Suite 1200  
Philadelphia, PA 19103-3938

*Sales of Personal Information*

Reliance Standard does not sell personal information and, in the preceding twelve (12) months, Reliance Standard did not sell any categories of personal information (for either minors or non-minors).

*Non-Discrimination*

California Residents have a right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA. Reliance Standard will not discriminate against any individual in any way for exercising any of his or her CCPA rights.

## **Violations**

Any failure on the part of any employee to adhere to this policy may result in disciplinary action up to and including termination.

## Addendum A

### Privacy Notice

Current Privacy Notice found at [RSLI.com](http://RSLI.com)

FACTS	WHAT DOES RELIANCE STANDARD DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li style="display: inline-block; width: 45%;">• Social Security number</li> <li style="display: inline-block; width: 45%;">• Name, address, telephone number</li> <li style="display: inline-block; width: 45%;">• Financial Information history</li> <li style="display: inline-block; width: 45%;">• Health information, including medical</li> <li style="display: inline-block; width: 45%;">• Date of birth</li> <li style="display: inline-block; width: 45%;">• Information about your job and salary</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Reliance Standard chooses to share, and whether you can limit this sharing.	
Reasons we can share your personal information	Does Reliance Standard share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
<b>For our marketing purposes</b> – to offer our products and services to you	YES	NO
<b>For joint marketing with other financial companies</b>	NO	N/A
<b>For our affiliates' everyday business purposes</b> – Information about your transactions and experiences	YES	NO
<b>For our affiliates' everyday business purposes</b> – Information about your credit worthiness	NO	N/A
<b>For our affiliates to market to you</b>	YES	YES
<b>For our non-affiliates to market to you</b>	NO	N/A
To limit our sharing	If you are new customer, we can begin sharing your information thirty (30) days from the date we send you this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. Please use the form below if you wish to limit our sharing.	
Questions?	Call 800-351-7500 or go to <a href="http://www.reliancestandard.com">www.reliancestandard.com</a>	

<b>Who we are</b>	
<b>Who is providing this notice?</b>	Reliance Standard Life Insurance Company, First Reliance Standard Life Insurance Co., Reliance Standard Life Insurance Company of Texas
<b>What we do</b>	
<b>How does Reliance Standard protect my information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. In addition, we have policies and procedures that direct our employees and agents to protect your personal information. We do not share your personal information except as authorized by you or allowed by law.
<b>How does Reliance Standard collect my personal information?</b>	We collect your personal information; for example, when you apply for insurance or file a claim. We may collect your personal information from you, your insurance agent or broker, your employer, your medical providers, consumer reporting agencies or anyone you have authorized to provide us with information.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes – information about your credit worthiness.</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> <li>• Our affiliates include other companies which are part of the Tokio Marine Group</li> </ul>
<b>Non-Affiliates</b>	Companies not related by common ownership or control. They can be financial and non-financial companies This includes entities which provide claim administration, underwriting, investigation, reinsurance, policyholder or other services to us or on our behalf.
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include insurance agents and brokers.
<b>Other Important Information</b>	
<b>Independent Sales Agents.</b> Your policy may have been placed with us through an independent agent or broker ("Sales Agent"). Your Sales Agent may gather and retain information about you. The use and protection of information by your Sales Agent is your Sales Agent's responsibility, not our responsibility. If you have questions about whether or how your Sales Agent uses or discloses such information, please contact your Sales Agent.	

## **Addendum B**

### **Privacy Notice for California Residents**

Current **Privacy Notice for California Residents** found at [RSLI.com](http://RSLI.com)

This **Privacy Notice for California Residents** supplements the information contained in our Privacy Notice and applies solely to consumers who reside in the State of California (“consumers” or “you”)

#### **Information covered by California Privacy law**

The California Consumer Privacy Act (CCPA) grants special rights to California residents with respect to “California Personal Information,” which means any personal information collected by Reliance Standard that is subject to the CCPA. The CCPA does not apply to information already protected under certain other laws, such as the Gramm-Leach-Bliley Act (GLBA), California Financial Information Protection Act; the Health Insurance Portability and Accountability Act (HIPAA); the Fair Credit Reporting Act (FCRA); and/or the Driver's License Protection Act.

#### **California Resident Rights Relating to California Personal Information**

1. The right to know what California Personal Information is collected, used, shared or sold, both as to the categories and specific pieces of personal information;
2. The right to delete California Personal Information held by businesses and, by extension, a business’s service providers;
3. The right to opt-out of the sale of California Personal Information.
4. The right to non-discrimination when a consumer exercises a privacy right under CCPA.

#### **Sources of Your Personal Information**

You are the most important source of California Personal Information but we may also verify or collect information on you from: (1) an insurance agent or group policy holder servicing your policy, (2) physicians; (2) other health care providers; (3) employers; (4) other insurers to which you have applied; and (5) consumer investigative organizations;

#### **Information That We Collect and How We Use It**

Reliance Standard may collect, use and share California Personal Information to provide you with our services and perform a contract.

#### **Collection of information**

All personal information is collected and used for the business purpose of providing a service to you and fulfilling a contractual obligation under an insurance or annuity contract issued by Reliance Standard. Reliance Standard has collected the following categories and specific types of personal information about consumers in the past 12 months: Identifies, Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), Protected classification characteristics under California or federal law, Sensory data, and Employment data.

#### **Use of information**

We may use and/or disclose the personal information we collect for one or more of the following business purposes: to set up a new client, to provide an insurance quote; to accept payments; to

communicate about a policy; to renew a policy; to obtain reinsurance for a policy; to make an underwriting decision; to process insurance and reinsurance claims; for general insurance administration purposes; to comply with our legal and regulatory obligations; to model our risks; to defend or prosecute legal claims; or to investigate or prosecute fraud.

Sharing of Information

Reliance Standard may disclose information to a service provider or third party for a business purpose. When we disclose your personal information, we request that the recipient keep the personal information confidential and not use it for any purpose except performing the contract. We share your personal information with the following categories: to our group companies, service providers and partners who provide data processing services for example, for billing and claims processing); to group policyholders/employers to determine claimant eligibility, to issue policy quotes, and to make underwriting determinations; to perform medical reviews during the claims process; to investigative services for the purposes of fraud detection; to our reinsurers in relation to policies and claims that they reinsure; to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect a consumer’s vital interests or those of any other person; and to any other person with consumer’s consent to the disclosure.

**Request for Access to Specific Information, Data Portability Rights**

If you are a California resident, California Civil Code Section 1798.93 permits you to request information about the collection and disclosure of your California Personal Information over the past 12 months. Reliance Standard endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt and is only applicable to California Personal information. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

**Verification of person making the request**

Reliance Standard values the responsibility of handling sensitive personal information. An individual making a request will need to provide information to us to verify that he/she is legally entitled to the information requested.

**Request for Deletions**

You may have the right to ask Reliance Standard to delete a piece of California Personal Information collected about you. We may deny your request for any California Personal Information that falls under an exemption permitted by an applicable California or Federal law.

**Submitting Requests**

If you wish to exercise your rights under California privacy law, you may

- 1. Call our Customer Service Department at 1-800-351-7500
- 2. Email us at [privacy@rsli.com](mailto:privacy@rsli.com)
- 3. Write to us at:

Privacy Officer  
Attn: California Privacy Rights  
Reliance Standard Life Insurance Company  
1700 Market Street, Suite 1200

Philadelphia, PA 19103-3938

**Sales of Personal Information**

In the preceding twelve (12) months, Reliance Standard has not sold any categories of personal information (for either minors or non-minors).

**Non-Discrimination**

You have a right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA. We will not discriminate against you in any way for exercising any of your CCPA rights.

**An Explanation of Cookies and How We Use Them**

Please see the **About Cookies** disclosure on our website.

**Changes to Our Privacy Notice**

This privacy notice may be updated and changed from time to time. We will post the new policy on this page.