

Guardian Privacy Statement



Effective Date: January 8, 2021

Guardian understands that you care about how we collect, use, and share information when you interact with our websites ("Sites"), online services, applications, and business operations and services (collectively, "Services"). We value the trust you place in us. This Privacy Statement (the "Privacy Statement" or the "Statement") explains how the Guardian Life Insurance Company of America and certain affiliates and subsidiaries ("we," "us," "our," "Guardian") collect, use, share, and protect information in connection with Guardian services that refer or link to this Privacy Statement.

This Statement explains:

1. the types of information we collect about you through our websites, online services and mobile applications (our "Sites") as well as from third party sources and offline in connection with our Services;
2. how we use and protect that information;
3. the types of information we may share with others and under what circumstances;
4. the rights you may have regarding your personal information and our data handling practices;
5. our security practices related to your information; and
6. other practices related to the handling of personal information.

This Privacy Statement forms part of our [Online Terms and Conditions of Use](#); please read each document carefully. By using the Services, you consent to our collection, use, and sharing of personal information about you as described in this Privacy Policy and in our Terms and Conditions of Use. If you do not agree to this Privacy Policy or our Terms and Conditions of Use, please do not use the Site.

A. When This Privacy Statement Applies

This Privacy Statement applies to our Sites, the use of our Services, the information we collect when you interact with us through social media, as well as to information that we collect offline (e.g., via paper or telephone call) and combine with information collected on our Sites or otherwise through the Services. It does not apply to non-Guardian websites and mobile applications that may link to or be linked from our Sites. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

This Privacy Statement does not apply to "nonpublic personal information" (as defined under the federal Gramm-Leach-Bliley Act ("GLBA")) such as investment account information, payment history, and account balance, or "protected health information" (as defined under the federal Health Insurance Portability and Accountability Act ("HIPAA")) such as health information or medical records, even if we collect such information through our Sites, Services or offline. For information about our privacy practices with respect to those types of information, please refer to our [Customer Privacy Policy](#) and [HIPAA Notice of Privacy Practices](#).

By accessing the Sites or using the Services, you agree to be bound by this Privacy Statement. We may make changes to this Privacy Statement from time to time. We will post any changes to www.guardianlife.com/privacy-policy, and update the "Last Updated" date at the bottom of this policy, so be sure to check back periodically. Such changes will become effective when they are posted. Your continued use of our Sites and Services following the posting of any changes will mean you accept those changes.

B. Information We Collect From or About You

Below we describe the different types of information we collect from you, including from the devices you use, when you interact with our Sites and/or take advantage of our Services.

Information You Give Us: We collect and maintain personal information about you from many sources to understand and meet your needs, provide our Services, manage our business, and for other purposes disclosed to you. We collect and store any information you enter on our Sites, provide to us in written form, or communicate to us verbally. This may include:

- Personal identifiers such as your name, address, email address, account name, social security number, driver's license number, passport number, etc.;
- Business contact information (e.g., information printed on a business card);
- Personal or physical characteristics protected by federal or state law, such as gender, race, ethnicity, age, etc.;
- Biometric information;
- Audio, electronic, visual, or similar information

This information may also include information you provide during a registration/sign-up process, including account numbers or other identifiers needed to link your account with a Guardian product.

We also collect personal information that you submit to us when applying for a job via the Guardian Life Careers website (including any CV or résumé that you upload to the website). This information will be collected and processed, where permissible by relevant, applicable law. This includes without limitation:

- Education and Professional Employment Information collected from you directly and third party sources authorized to provide additional background information about criminal history.

Usage Data: When you interact with our Sites, certain information is automatically collected. This information includes computer and connection information, such as statistics on your page views, traffic to and from our Sites, referral URL, advertising data, your IP address, browser type, and device identifiers. This information also may include your transaction history, and your web log information, how you search for our Sites, the websites you click on from our Sites or emails, whether and when you open our emails, and your browsing activities across other websites. We may combine this data with the aforementioned collected information, which may identify you.

Tracking Data & Cookie Policy. We make limited use of cookies and other online tracking technologies to understand visitor activity on our Sites, and to remember certain information about your preferences to better understand and help improve your experience while using the Sites.

A cookie is a text file sent by a web server and placed on your computer by your web browser. Cookies can be divided into two different types: session and persistent. The information may be automatically collected for these purposes may include log file information such as Internet protocol (IP) addresses, browser type, browser language, browsing history, referral URLs, pages viewed, and the date and time of a visit.

You may reset your browser to refuse all cookies or to allow your browser to alert you when a cookie is set, however, certain parts of the Sites may function differently and not as well and you may not be able to use some portions of our Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our Sites will issue cookies when you log on to the Sites. For more information about how to manage your cookies preferences, you should use the "help" menu of your web browser or explore the customer support sections of your web browser. Please note that you may need to configure each browser on each device that you use if you wish to opt-out or block some or all cookies. We do not respond to browser Do Not Track signals.

Location Information: When you interact with our Sites, we may collect information about your location and your device. Some of this information may be general, such as the state or city associated with your zip code, while some of this information may be more precise, such as information associated with your mobile device or desktop computer. Location information allows us to provide location-based services to you such as showing you the location of nearby financial advisors. Most mobile devices allow you to control or disable the use of precise location services globally or per application in the device's settings menu.

Information from Social Media and Third Party Services: When you connect to, authenticate through, or interact with us or our Sites using a social media platform (such as by clicking on a social media icon linked from our Sites) or third party service (such as a Google account), we will collect information, including personal information, available through the service or the service's application programming interfaces (APIs). This information may include your name, account ID or username, contact details, email address(es), information related to your contacts, calendars, location information, profile picture, the contents of your posts or other communications, and other information the platform or third-party service makes available. If you choose to log in to your account with or through a social networking service or third-party service, you intentionally interact with that third party service and, by doing so, will be sharing information about yourself and your activities with that service directly or through us. Please note that we do not control, and are not responsible for, other uses of your personal information by your third party service. You should check your privacy settings on these platforms and third party services to understand what information is made available to us, and you may be able to change the settings for these platforms or services to prevent, limit or otherwise control the information made available to us.

For job applicants, we may also collect information about you from publicly available social media profiles, such as content from external job bulletin boards.

Biometric Information: We may collect information from you about your characteristics (e.g., voiceprints, scans of face geometry) to create biometric identifiers, which we may use to identify and authenticate you, including to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and to administer your account and maintain account-related records. We will obtain your consent before your information is used to create a biometric identifier. We may use third party service providers or disclose information as required by law or as otherwise specified in this privacy policy. However, we will not disclose your biometric identifiers to any third parties for their own use. We will protect your biometric information with the same security standards that we use to protect your highly sensitive personal information. We will retain your biometric information for as long as necessary for the purposes identified above, you have consented, and as required by applicable law.

Information related to Minors: Guardian does not knowingly collect information directly from minors—persons under the age of 13, or another age of a minor as defined by law—via our Sites or offline, other than when required to comply with the law or for safety or security reasons.

If you are a parent or guardian of a minor who has provided information without your knowledge or consent, you may submit a request to remove the minor's information by emailing us at privacy_office@glic.com.

C. How We Use Information We Collect From or About You

We may use information you give us or information we collect about you to:

- Communicate with you, including to respond to your inquiries and fulfill your requests;
- Respond to your comments and queries for our internal business purposes;

- Provide, maintain, personalize, optimize, secure and improve our Sites or Services, including research and analytics regarding use of our Sites, social media platforms and third party services, physical locations, facilities and infrastructure and to remember you when you leave and return to our Sites or facilities;
- Provide and improve our products and services, including to provide you with financial or health-related tools, to process any transactions you request, or to authenticate your identity;
- Discuss, negotiate, and facilitate business transactions with our brokers and agent representatives;
- Deliver advertising, including interest-based advertising on our Sites, other websites and applications and other media;
- If applicable, evaluate your application for employment with Guardian, including to communicate with you about your application, conduct any necessary or appropriate background checks, comply with our policies, manage any aspects of your prospective, current or former employment relationship with Guardian and verify personal information by contacting your references;
- In connection with the establishment and defense of legal interests
- Comply with our obligations, including legal, regulatory, operational or fiscal obligations, including to report adverse events to regulators;
- Detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal; and
- For all other purposes to which you have agreed.

We may combine information that you provide to us or information that we collect automatically through our Services with other information we obtain from our business records, including your use of Guardian products, services, websites and applications and, where applicable, your preferences and other personal characteristics. We also may use or combine information that we collect with information we obtain from third parties, including demographic information and other attributes, such as census data, purchasing data, demonstrated interests (for example, an interest in travel), loyalty programs, organizational affiliations and customer lists. Additionally, information collected from a particular browser or device may be used with another computer or device that is linked to the browser or device on which such information was collected.

We may use information we collect from or about you to create aggregated or de-identified data that does not identify you. Once the data is aggregated or de-identified, we may use it for any purpose permitted by law and we may share it with third parties for their own uses.

Absence Management and Administrative-Only Claim Services (When we are acting as a Service Provider to Your Employer)

You may also provide personal information directly to us (by website, email, telephone, and/or mail) as a benefit plan participant for the purpose of our administration of your employer's benefit plan. Your employer or service providers (such as payroll processors, disability plans, health plans, or mutual funds) may also provide personal information to us for the same purpose.

In this role, we may also collect your benefit program participation and coverage information, such as benefit elections, beneficiary information, claims information, benefit plan account balances or accrued benefits, and date of retirement, which we use for the purposes of providing absence management and administrative-only claim services to your employer. This information is disclosed to our service providers that assist us in providing those services to your employer, and any third parties as required or directed by your employer or applicable law.

Interest-Based Advertising

Guardian uses the information you make available to us when you interact with our Sites or Services to provide you with advertising and offers that are more relevant to you. We partner with third party advertising companies to provide advertisements on our Sites, as well as on other websites and applications about our products and services that may be of interest to you. Some of our Sites may also include advertisements for unaffiliated products and services. The advertisements you see may be based on information collected through cookies, web beacons and other tracking technologies from our Sites and on other third-party websites you visit and mobile applications you use that participate in our advertising networks. These third parties may use persistent identifiers to track your Internet usage across other websites and mobile applications in their networks beyond our Sites. While Guardian will not share information that personally identifies you with unaffiliated third parties for their own uses, such third parties may, with sufficient data from other sources, be able to personally identify you.

You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#), and the webpages for [Facebook's ad preferences tool](#) and [privacy policy](#). Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device. For more information about how to change these settings go to:

- Apple: <http://support.apple.com/kb/HT4228>
- Android: <http://www.google.com/policies/technologies/ads/>
- Windows: <http://choice.microsoft.com/en-US/opt-out>

Please note that opting-out of advertising networks services does not mean that you will not receive advertising while using our Sites or on other websites, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, your opt-out preferences may also be removed.

We use third parties to provide analytics services about your use and interaction of our sites, including Google Analytics, a web analytics service provided by Google, Inc. Google Analytics and our other third party service providers and partners use cookies or other tracking technologies to help us analyze how users interact with and use our Sites, compile reports on our Sites' activity, and provide other services related to our Sites' activity and usage. The technologies used by these third parties may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website. Our Sites do not use Google Analytics or other third-party services to gather

information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt out of tracking of analytics by Google, click [here](#). Your browser or device may include "Do Not Track" functionality. As noted in our cookies section, at this time, Guardian does not respond to browser "Do Not Track" signals.

D. How We Share Information About You

We may share your information:

- With companies who work on our behalf to help us provide and support our Sites and our products and services. We require these service providers to treat all information we provide as confidential and to use it only for providing the services for which they have been engaged.
- Within the Guardian family of affiliate companies to provide you products and services as described in our [Customer Privacy Policy](#).
- With Guardian agents or financial advisors that sell and manage Guardian products so that they may communicate with you about our products and services, as well as to deliver marketing communications, including emails, newsletters, offers tailored to you, and other materials that they believe may be of interest to you.
- Where disclosure is necessary in connection with other business purposes including, without limitation, customer care, service quality, business management and operation, recruiting and talent management, risk assessment, security, fraud and crime prevention/detection, monitoring, research and analysis, marketing, customer purchasing preferences, and trends and dispute resolution.

We may change our ownership or corporate organization. We may transfer to another entity or its affiliates or service providers some or all of the information we hold about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in the Privacy Statement.

We also may disclose information pursuant to a request from law enforcement or pursuant to other legal or regulatory process, or as otherwise required by law, or, in our sole discretion, to protect our rights, property or interests, including to enforce this Privacy Policy or our Terms and Conditions of Use.

We may use or disclose information about you if required to do so by law or on the good-faith believe that such sharing is necessary to (a) conform to applicable law or comply with legal process served on us or our Sites; (b) protect and defend our rights or property, our Sites, or our users; or (c) act to protect the personal safety of our employees and agents, other users of our Sites, or members of the public.

E. Rights You Have Regarding Our Data Handling Practices

By using our Sites or Services and/or submitting personal information to us, you are accepting and consenting to the practices and uses described in this Privacy Statement. This Privacy Statement is not a contract.

Your Rights to Request Access to and Deletion of your Personal Information

Under the California Consumer Privacy Act ("CCPA"), California consumers (both customers and employees), subject to certain exceptions, have the right to request access and deletion of your Personal Information collected, used, transferred, disclosed, sold, or processed by Guardian.

You can, subject to proper validation:

- Request confirmation as to whether Guardian has Personal Information relating to you;
- Request access to your Personal Information in a form permissible under applicable laws and regulations; and,
- Request deletion of your personal information.

You can make such a request by submitting a request via the [Consumer Privacy Rights Request Intake Form](#) on our website or by calling us at 1-888-Guardian. If required by law, we will disclose and deliver the required information to you free of charge by mail or in a portable and readily usable electronic format within 45 days of receiving a verifiable request (with an additional extension of 45 days if reasonably necessary). You may request this information free of charge up to two (2) times in a 12-month period.

We will verify your request by reviewing the information that we require in our Consumer Privacy Rights Request Intake Form to authenticate your identity. You may also designate an authorized agent to make a request on your behalf through the above methods. If you submit a request through an authorized agent, we may request that such authorized agent provide information sufficient to verify your request and authenticate your identity and that your agent is in fact authorized to act on your behalf. You may also make a request for household information; however household requests will only be processed upon the verified request of each member of the household.

To verify your request, we may ask for information including your full legal name, residential address, email, phone, date of birth and last four digits of your social security number, as well information we may have on file about you (such as your policy number or a date of hire). The information we require may vary depending on your relationship to us. If you are requesting on behalf of another consumer, we may request additional information from you and/or the consumer to verify their identity. If you have not previously purchased a product or service from us or been employed by us we may require you to take additional steps to verify your identity. If we are unable to verify your identity using this process, we will provide you with a response explaining so and what additional action you may take to ensure we can successfully verify your request.

If you request your information to be deleted by us, we will verify the request and provide you with an explanation if we need to retain information about you as required by law. Prior to deleting your information, we may ask that you reconfirm that you would like us to do so.

Some of the information that we collect may not be reasonably associated with you directly. In such instances that information will not be addressed as part of your request. You can learn about aggregate information throughout this Statement.

You can learn additional information about the categories of personal information we collect, the sources of collection for each category of personal information, the purpose of collection and use for each category of personal information, and the types of third parties with which we share each category of personal information in the [Guardian Privacy Statement Chart](#).

We Do Not Sell Your Personal Information

Currently we do not and will not sell or disclose your information to third parties for monetary or in-kind compensation.

Under the CCPA, California consumers have the right to request that their information not be sold for value. Guardian does not currently engage in such activities; however, if this practice changes in the future, we will provide updated information via this Privacy Statement and provide instructions on this page to submit a request to stop selling your personal information.

Under the CCPA, California consumers have the right not to receive discriminatory treatment from the exercise of the aforementioned rights. Guardian will not discriminate against you for exercising your rights under this Statement.

Updating Your Information

If you have an account with us, you can update your information or adjust your contact and marketing preferences by logging in to your online account. You may also contact your account representative or financial advisor to update information related to the accounts they manage.

F. How We Secure the Information We Collect From or About You

We use a combination of commercially reasonable physical, technical, and administrative safeguards to protect the information we collect through our Sites and offline. When your personal information is shared, Guardian will take a reasonable approach to prevent the unauthorized use or disclosure of personal information.

While we use these precautions to safeguard your personal information, please be aware that no security measures are perfect or impenetrable. We cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf. Please use caution when submitting any personal or other sensitive information to us online.

You can learn more about how we protect your information [here](#).

G. Other Important Information

Updating Your Information

For certain products and services, you may have the opportunity to update or correct your personal information, such as your contact information or benefits elections. In such cases, we may rely on you or your employer to keep personal information accurate and up to date, which may be done through our self-service websites or calling our call centers. In some circumstances, such as leave management or other benefits administration, only your employer has the authority to update or correct personal information, and such requests must be directed to your employer.

Retaining Your Information

In general, we do not keep Personal Information longer than is necessary for the purpose or purposes for which the Information was originally collected and processed.

If required, we may also retain your Personal Information where such retention is necessary for compliance with a legal obligation to which we are subject.

Aggregation Websites: Other companies offer websites and services that allow you to consolidate account information from multiple sources. To do this, those companies might ask you for your Guardian account credentials. Whether to provide your account credentials to these sites is solely at your own discretion, and Guardian is not responsible for your use of such websites and services.

If you provide account credentials or other details about your Guardian account to such website or services, Guardian will consider that you have authorized the website or service to access your Guardian account information. If you decide to revoke the authority you have given to an aggregation website or service, we strongly recommend that you change your password for the Sites to ensure that your Guardian account is inaccessible to the aggregation website or service.

Users Outside of the United States: We are based in the United States and our Sites and Services are directed to residents of the United States. The information you submit to us and that we collect as a result of using our Services may be transferred to the United States or to another jurisdiction in which our service providers operate. By using our Services you consent to the collection, international transfer, storage, and processing of your information by us and our service providers. If you use our Sites outside of the United States, you understand and consent to the transfer of information about you, and the collection, processing, and storage of information about you, in the United States and elsewhere. The laws in the U.S. and these countries regarding personal information may be different than the laws of your state or country. If it is illegal to access our Sites or transfer your data to the United States, please do not use our Services.

Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please visit our [Accessibility](#) page for additional information.

For Questions, or to Report a Problem

If you have other questions, comments or concerns about our privacy practices, or if you wish to issue a request to exercise your rights where applicable by law, please contact us at 1-888-Guardian or email our Privacy Office at privacy_office@glic.com. Please provide your name and contact information along with the request.

Alternatively, inquiries may be mailed to the following address:

Mailing address:

Guardian Life Insurance Company of America
c/o Privacy Office
10 Hudson Yards
New York, NY 10001 USA

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