



# CCPA Privacy Policy for California Residents

Last Updated: March 2022

This CCPA Privacy Policy for California Residents (“CCPA Privacy Policy” or “Policy”) supplements the information contained in Great American Life Insurance Company’s (“Great American Life,” “we,” “us,” or “our”) online privacy notice and customer privacy notices at <https://myannuity.gaiq.com/privacy> and applies solely to consumers who are residents of the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Terms used in this CCPA Privacy Policy, such as personal information, consumers, and service providers, have the same meaning as they are defined in the CCPA.

## Summary of CCPA Privacy Policy

Please read this entire Policy carefully to understand our practices regarding your personal information. The following points summarize some of the important details discussed below:

- Under the CCPA, a California consumer has the right to request that Great American Life disclose what personal information we collect, use, disclose, and sell. Note, however, that Great American Life does not sell personal information.
- Under the CCPA, a California consumer also has the right to request that Great American Life delete the personal information we have collected from the consumer.
- Not all of your personal information is subject to the CCPA. Notably, if you are a Great American Life customer, your personal information may be subject to other privacy laws and your personal information that Great American Life maintains may be exempt from the CCPA. Your rights under other applicable privacy laws are described in our online privacy notice and customer privacy notices, which can be found at <https://myannuity.gaiq.com/privacy>.
- California consumers who exercise their privacy rights under the CCPA will not receive discriminatory treatment by Great American Life.

## What is Personal Information?

The CCPA provides personal information rights to California residents. The CCPA defines personal information as information that “identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular” California consumer or household. Personal information does not include publicly

available information or consumer information that is deidentified or aggregate consumer information.

## What Personal Information Does Great American Life Collect, for What Purpose, from Whom, and Do We Disclose it to Service Providers?

Because of the nature of our business, we need to collect personal information to provide and develop our products and services, and we work hard to maintain the trust and confidence consumers demonstrate when they share their personal information with us.

The chart below describes the categories of personal information we collect, the purpose of our collection, the source of the personal information, and whether we disclose the personal information:

<b>CATEGORY</b>	<b>EXAMPLES</b>	<b>PURPOSE OF COLLECTION</b>	<b>SOURCE OF COLLECTION</b>	<b>DISCLOSED TO SERVICE PROVIDER FOR BUSINESS PURPOSE?</b>
<b>Identifiers</b>	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	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Employer Service provider Data broker	Yes
<b>Personal information categories listed in the California Customer Records Statute</b>	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health information	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Employer Service provider Data broker	Yes

<b>CATEGORY</b>	<b>EXAMPLES</b>	<b>PURPOSE OF COLLECTION</b>	<b>SOURCE OF COLLECTION</b>	<b>DISCLOSED TO SERVICE PROVIDER FOR BUSINESS PURPOSE?</b>
<b>Commercial Information</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Service provider Data broker	Yes
<b>Biometric Information</b>	Genetic, physiological, behavioral, and biological characteristics or activity patterns used to extract a template or other identifier or identifying information, such as: fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, as sleep, health, or exercise data	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Service provider Data broker	Yes
<b>Internet or other similar network activity</b>	Browsing history, search history, Internet Protocol address, information on your interaction with our website, applications, or advertisements	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Service provider Data broker	Yes
<b>Geolocation data</b>	Physical location or movements	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Service provider Data broker	Yes
<b>Sensory data</b>	Audio, electronic, visual, thermal, olfactory, or other similar information	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Service provider Data broker	Yes
<b>Professional or employment related information</b>	Current or past job history or performance evaluations	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Employer Service provider Data broker	Yes
<b>Inferences drawn from other personal information</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Product sales process Product servicing Marketing Product development Corporate Administration/Operations	Consumer Service provider Data broker	Yes

## Does Great American Life Sell Personal Information?

Great American Life does not sell personal information and we have not done so for the 12-month period preceding the last revision date of this CCPA Privacy Policy.

## What Are My CCPA Rights to Know About My Personal Information?

You have the right to know certain information about our collection, use, and disclosure of your personal information for the 12 months preceding the date of your request. You also have the right to request that we provide you with specific pieces of your personal information. These rights are subject to certain exceptions.

Upon receipt of your request, and after we verify your identity, we may provide you with information about the following:

- The categories of personal information we collected about you.
- The categories of sources of the personal information we collected about you.
- Our business or commercial purpose for collecting the personal information.
- The categories of personal information we disclosed about you to a service provider.
- The specific pieces of personal information we collected about you (data portability).

If responding to all or part of your request would conflict with federal or state law, or your personal information is subject to an exemption under the CCPA, we will inform you of that fact. We will respond to the portion of your request that is not in conflict with applicable laws or exempt under the CCPA.

## What are My CCPA Rights to Have my Personal Information Deleted?

You have the right to request that Great American Life delete personal information we have collected from you, subject to certain exceptions and exemptions. Absent an exception or exemption, upon receipt of your request, and after we verify your identity, we will delete and will request that our service providers delete your personal information.

## How Do I Exercise My CCPA Rights?

Beginning January 1st 2020, if you are a California resident and would like to submit a CCPA request, you may:

- Contact us by phone at 1-888-595-6918, or
- visit <https://myannuity.gaig.com/privacy> and select the Request to Access or Delete Personal Information of California Residents.

Only you, or a person you authorize to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To authorize another person to make a verifiable request on your behalf, you must provide that person with written permission clearly describing their authority to make a request on your behalf. That individual must also be able to verify their identity with us and provide us with their authority to act on your behalf. An individual to whom you have provided Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code may also make a request on your behalf.

## How Will you Verify My Identity If I Make a CCPA Request?

In order to verify your identity, we will need to collect sufficient information to allow us to reasonably verify you are the person about whom we collected personal information or that you are the person authorized to make the request. We will use this information to verify your identity using reasonable methods in order to process your rights request. These methods may include matching information you provided to us with information already maintained by us or through the use of a third party identify verification service.

We will use the information you provide to verify your identity and to respond to your rights request and for no other purpose.

We cannot respond to your request or provide you with personal information if we are not able to verify your identity or authority to make the request or confirm the personal information relates to you.

You are not required to have an account with us to make a verifiable request.

## What Are My CCPA Non-Discrimination Rights?

We will not discriminate against you for exercising any of your CCPA rights, which means 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.

## How Do I Contact Great American Life with Questions About the CCPA Privacy Policy?

If you have any questions or concerns about this CCPA Policy, please contact us at 1-888-595-6918.