Allianz Life Insurance Company of North America PO Box 59060 Minneapolis, MN 55459-0060 800.328.5600



# PRIVACY NOTICE

## FOR CALIFORNIA RESIDENTS

#### WHEN THIS PRIVACY NOTICE APPLIES TO YOUR PERSONAL INFORMATION

This Privacy Notice for California Residents (Notice) supplements the information contained in the Allianz Life Insurance Company of North America (Allianz or "we", "our", "us") Online Privacy Policy, HIPAA Privacy Notice, and Privacy Notice, found on our website at www.allianzlife/privacy and applies solely to all visitors, users, and others 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 as amended by the California Privacy Rights Act of 2020 (collectively, "CCPA"). Any terms defined in the CCPA have the same meaning when used in this Notice.

## WHEN THIS PRIVACY NOTICE DOES NOT APPLY TO YOUR PERSONAL INFORMATION

This Notice for consumers who are California residents does not apply when your Personal Information is not covered by the CCPA and instead is collected, used, and protected under other federal privacy laws including, but not limited to, the Gramm-Leach-Bliley Act ("GLBA"), the Health Insurance Portability and Accountability Act ("HIPAA"), and the Fair Credit Reporting Act ("FCRA"). Most of the Personal Information we collect about you is exempt from the scope of the CCPA. However, we provide this Notice because we want to be transparent about our information collection practices.

This Notice also does not apply to information collected in a business-to-business context or to employment-related Personal Information collected from California-based employees, job applicants, or contractors who receive separate Privacy Notices tailored to those business contexts.

Additional details regarding our collection of Personal Information in other contexts can be found on our website at www.allianzlife.com/privacy in our Online Privacy Policy, HIPAA Privacy Notice, and Privacy Notice. If you have a disability that prevents or limits your ability to access this Privacy Notice, please contact us at 866.360.0603 or email us at privacy@allianzlife.com. We will work with you to provide this Privacy Notice in an alternate format.

Allianz collects this information on behalf of itself and the following affiliates: Allianz Life Insurance Company of New York; AZOA Services Corporation; and Allianz Technology of America, Inc.

This Privacy Notice for California Residents is effective February 1, 2024.

As used in this Privacy Notice, "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you or your household or device. Personal Information includes, but is not limited to, the categories of Personal Information identified below if such information identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular individual or household. Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information exempted from the CCPA's scope, such as:
  - Personal Information governed by certain sector-specific privacy laws, including the Gramm-Leach-Bliley Act ("GLBA"), the Fair Credit Reporting Act ("FCRA"), or the California Financial Information Privacy Act ("FIPA");
  - Health or medical information governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA).

#### CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND BUSINESS PURPOSES FOR PROCESSING

We collect the following categories of personal information for the purposes described below, as permitted by applicable law. These categories are defined by California law and represent the personal information that we may have collected about California residents, and how it may have been shared, over the past 12 months. Our business purposes for processing your information are provided below the chart. The inclusion of a category in the list below indicates only that we may collect this information for certain individuals for some activities within the scope of the identified business purpose. It does not necessarily mean that we collect all the information listed in a particular category for all individuals.

We have shared information in each category with our affiliates and service providers for our business purposes within the last 12 months. As an insurance company, we may also receive requests for information from regulatory authorities, our auditors, and/or our legal advisors. If requested from such parties, we would share your Personal Information as appropriate.

CATEGORY OF PERSONAL INFORMATION	TYPES OF INFORMATION COLLECTED
Personal Identifiers	Real name, alias, date of birth, residential address, postal address, telephone number, unique personal identifiers including online identifiers, internet protocol (IP) address, email address, Social Security number, driver's license or state identification card number, passport number, written signature, insurance policy number, or other similar identifiers.
Demographic Identifiers	Demographic information protected under federal law, California law or other state law, including age, sex, gender, sexual orientation, national origin, citizenship, race, education level, marital status, health and physical or mental disability status, or military/veteran status.
Employment Information	Employment history, occupation, position, professional licensures, salary information, professional or employment-related information, including written signatures, and other information collected from a resume or application.
Education	Education history including educational institutions attended, degree(s) and/or certification(s) earned, and other information collected from a resume or application.
Financial Information	Financial information including bank account number, source of funds for the contract or policy, source of wealth, assets, or other financial information.
Medical or Health Information	Medical information including any information in possession or derived from a healthcare provider, healthcare service plan, pharmaceutical company, or contractor regarding an individual's medical history, mental or physical condition, or treatment. Health insurance information including an individual's insurance policy number or subscriber identification number, any unique identifier used by a health insurer to identify the individual, transaction information, or any information in the individual's application and claims history.
Internet or other Electronic Network Activity	Online identifiers, and information regarding an individual's or an individual's device interaction with an internet website, application, or advertisement.
Profile Information	Inferences drawn from any of the information listed above, including creating a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Audio/Visual Information	On-site cameras for security, video, photos, and audio recordings such as a recording of a customer service call.

#### PURPOSES FOR WHICH WE COLLECT PERSONAL INFORMATION

- To create, customize, and secure your account(s) with us.
- To process your requests and transactions and to maintain and service your account(s).
- To fulfill or meet the reason you provided the information and to provide goods or perform services requested by you.
- We may use artificial intelligence, predictive models, or machine learning, including third-party external consumer data and information sources, in compliance with applicable laws and regulations, to aggregate a wide variety of diverse data sources to augment our insurance practices.
- To determine if an insurance product is suitable for you.
- To provide you with support and respond to your inquiries, including to investigate and address your concerns, and to monitor and improve our responses.
- To personalize your experience, and to develop and deliver content, product, and service offerings.
- To maintain the safety, security, and integrity of our business, website, products, services, databases, and other technology assets.
- To obtain identity and digital footprint identifiers in order to improve security and detect and prevent against malicious, deceptive, fraudulent, or illegal activity.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.

In addition to the purposes identified above, Allianz may use and disclose any and all Personal Information that we collect as necessary or appropriate to:

- Comply with laws and regulations, including (without limitation) applicable tax, customer due diligence (including identity verification), health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws.
- Monitor, investigate, and enforce compliance with potential breaches of Allianz policies and procedures and legal and regulatory requirements.
- Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons.
- Detect, investigate, and help protect against malicious, deceptive, fraudulent, or illegal activity.
- Exercise or defend the legal rights of Allianz and its employees, Directors, Officers, affiliates, customers, contractors, and agents.

## **SOURCES OF PERSONAL INFORMATION**

- Directly from you or your authorized agent, for example, from your insurance application, other forms you complete, or products and services you purchase;
- Indirectly from you, for example, from others through the process of issuing or administering a policy or handling a claim;
- Directly from you or during a recorded customer service call;
- Directly from you and/or your device;
- From your actions on our Website; or
- From Credit Reporting Agencies, third-party external consumer data and information sources, and other public databases.

We also collect the below categories of **Sensitive Personal Information** as defined under California law. We generally use Sensitive Personal Information only for the necessary purposes listed below.

CATEGORY OF SENSITIVE	TYPES OF SENSITIVE PERSONAL INFORMATION COLLECTED
PERSONAL INFORMATION	
Sensitive Personal Information / Not publicly available	Social Security number, driver's license number, state identification card number, or passport number, race, ethnic origin, citizenship or immigration status, sexual orientation, or physical characteristics or description.

#### PURPOSES FOR WHICH WE COLLECT AND SHARE SENSITIVE PERSONAL INFORMATION

- To create, customize, and secure your account(s) with us.
- To provide goods or perform services requested by you. For example, if you provide information to purchase an insurance product, we will use the information to process your request.
- To offer additional no-cost services to certain policyholders.
- To maintain and service your account(s). To detect, investigate, and help protect against malicious, deceptive, fraudulent, or illegal activity.

### **SOURCES OF SENSITIVE PERSONAL INFORMATION**

- Directly from you, for example, from your insurance application, other forms you complete, or products and services you purchase; or
- Indirectly from you, for example, from others through the process of issuing or administering a policy or handling a claim.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Additional details regarding our collection of Personal Information can be found on our website at www.allianzlife.com/privacy in our Online Privacy Policy, HIPAA Privacy Notice, and Privacy Notice.

#### DISCLOSURE OF PERSONAL INFORMATION

We may disclose your Personal Information to third parties (e.g., service providers) for business purposes. When we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to ensure the information is confidential, and not to use it for any purpose other than performing the contract. We may transfer your information to another country for processing as permitted and in compliance with applicable law. We do not sell your Personal Information to third parties, nor do we share your information for cross-context behavioral advertising purposes, as defined under California law. We may share your Personal Information as allowed by law for the business purposes described in this Privacy Notice with the following parties:

CATEGORY	DESCRIPTION
Corporate Affiliates	We may share your information with our corporate affiliates and with their respective officers, directors, employees, accountants, attorneys, and agents.
Acquisitions and Similar Transactions	If the company is sold or part of its assets are merged with another company, your personal data may be transferred as part of the merger or sale.
Disclosures with Your Consent	We may ask if you would like us to share your information with other unaffiliated third parties not described elsewhere in this Policy. We will only disclose your information in this context with your consent.
Legal Obligations and Rights (Subpoenas, Court Orders, and Warrants); Regulatory Authorities	We may disclose information to comply with the law, including disclosure to relevant industry regulatory bodies, or in response to subpoenas, warrants, court orders, or other legal process.
Service Providers	We may share your Personal Information with service providers that need access to information to detect fraud, perform operational and other support services on our behalf including vendors providing services, software, tools, platforms, and others used by Allianz to perform operational and business functions.
Professional Advisors (Auditors and Legal Advisors)	We may share your information with our professional advisors, including attorneys, auditors, and accountants, to provide services on our behalf.

	We may disclose aggregated information or de-identified information about our users that does not identify any specific individual.
Other	Where required or permitted by law.

#### PERSONAL DATA STORAGE AND RETENTION

We and our service providers store personal information on computer systems. We keep records containing personal information in accordance with applicable state and federal regulations or contractual obligations. We aim to retain personal information only for as long as necessary for the purposes it was collected for, including defending or advancing legal claims, and to comply with legal obligations. We may need to keep some personal information for longer than other information to comply with applicable laws and regulations, including litigation.

When determining how long to retain a record, including any personal information it contains, we consider the following criteria:

- The length of time the record is needed to provide the products and services you request and maintain our business relationship.
- The length of time the record is needed to support and improve our operational processes.
- The length of time the record is needed to protect our rights and legal interests.
- The length of time the record must be kept to comply with applicable laws and regulations.

The same personal information about you may be included in more than one record and used for more than one purpose, each of which may be subject to different retention periods based on the factors listed above.

We may delete personal information if we believe it is incomplete, inaccurate, or that our continued storage of it is contrary to our objectives or legal obligations. When we delete data, we remove it from our active servers and databases, but it may remain in our archives when it is not practical or possible to delete it.

To the extent permitted by law, we may retain and use anonymous, de-identified, or aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement.

#### YOUR PRIVACY RIGHTS

If you are a California resident, California law provides you with specific rights regarding your Personal Information, subject to certain limitations. These rights do not apply, as they relate to the information we collect about you in connection with providing financial products or services. This section describes California resident rights, and explains how to exercise those rights if they apply to you.

- 1. **Right to Access Your Data.** You have the right to request that we disclose certain information to you about our collection and use of your Personal Information. Once we receive and confirm your verifiable consumer request, you have the right to receive:
  - The categories of Personal Information we collected about you.
  - The categories of sources for the Personal Information we collected about you.
  - Our business or commercial purpose for collecting, selling or sharing that Personal Information.
  - The specific pieces of Personal Information we collected about you, including by a service provider or contractor.
  - The categories of third parties with whom we share that Personal Information.
  - The specific pieces of Personal Information we've disclosed for a business or commercial purpose, identifying the Personal Information categories that each category of recipient obtained about you.

Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. However, California residents may request information for the prior 24-month period. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

- 2. Right to Data Portability. You have the right to a "portable" copy of your Personal Information that you have submitted to us. Generally, this means you have a right to request that we move, copy or transmit your Personal Information stored on our servers / IT environment to another service provider's servers / IT environment.
- **3. Right to Correction.** You have the right to request correction or changes of your Personal Information if it is found to be inaccurate or out of date.
- 4. Right to Delete Your Data. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.
- 5. Right to Opt Out of Sale or Sharing of Personal Information. We currently do not sell Personal Information to third parties or share your Personal Information with third parties for cross-context behavioral advertising purposes, and therefore we do not offer this option. We may disclose Personal Information about you to our affiliates and service providers as permitted by law. Please see the "Sharing Personal Information" portion of this policy for more information.
- **6. Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to request we limit the use of your sensitive Personal Information to only purposes necessary to engage with you. This sensitive Personal Information is defined in California law, and you will find a more detailed description of what type of information this entails in the charts included above. We do not use your sensitive Personal Information for purposes other than those necessary to engage with you, to aid in protecting and securing your Personal Information and our systems, to verify or maintain the quality or safety of our services and systems, or as otherwise permitted under regulations or required law.
- 7. Right to Non-Discrimination. We will not discriminate against you for exercising any of your privacy rights.

Any rights a consumer, claimant, or beneficiary may have as described in this notice are not limited by the standard privacy notice that we use.

#### **EXERCISING YOUR RIGHTS**

If you have questions about your privacy rights, our privacy practices, or to exercise your rights, you, or an agent authorized to request information on your behalf, must submit a verifiable consumer request using one of the methods listed below:

- Calling us at 800.328.5600
- Emailing us via privacy@allianzlife.com
- Contacting us through the secured website www.allianzlife.com

Writing to us at: Allianz Life Insurance Company of North America Attn: Privacy Office PO Box 59060 Minneapolis, MN 55459-0060

#### **AUTHORIZED AGENT**

If you would like to appoint an authorized agent to make a request on your behalf, you must provide the agent with written, signed permission to submit privacy right requests, on your behalf, or provide a letter from your attorney. The agent or attorney must provide this authorization at the time of the request. We may require you to verify your identity with us directly before we provide any requested information to your authorized agent.

#### **VERIFICATION**

Upon receiving your request, we will confirm receipt of your request by sending you an email/confirming receipt. For your privacy and security, we may take steps to verify your identity before granting you access to the information. For example, we may collect information from you, including, to the extent applicable, your name, government identification number, date of birth, contact information, your account information, answers to security questions, or other personal identifying information. We will verify your identity and respond to your request by matching the information you provide with information we have previously collected about you or from consumer reports. The information collected for verification purposes will be used solely for that purpose. If you have an account with us, you may be asked to log in to your account when submitting your request.

If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. In some instances, such as a request to delete personal information, we may first separately confirm that you made the request for us to delete your personal information before acting on your request.

#### **RESPONSE TIMING AND FORMAT**

If you are entitled to any of the above described rights, we endeavor to respond to a verifiable consumer request within thirty (30) business days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by postal mail or electronically, at your option.

Any disclosures we provide will cover the 12-month period preceding receipt of a verifiable consumer request. However, California residents may request information for the prior 24-month period. If we are unable, or if we refuse to comply with a request, the response we provide will explain the reasons we cannot comply. If we refuse to satisfy your request, you will have the right to provide a concise statement including the information you believe to be accurate and fair information and why you disagree with our refusal and we will put your statement in our files so that anyone reviewing your file will have access to it. 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 from one entity to another entity without hindrance. 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.

#### **CHANGES TO OUR PRIVACY NOTICE**

We reserve the right to change this Privacy Notice as needed from time to time. If we make changes, we will post the revised Privacy Notice on our website with an updated effective date.

#### **CONTACT INFORMATION**

If you have any questions or comments about this notice, the ways in which we collect and use your information described here, your choices and rights regarding such use, or wish to exercise your rights under state privacy laws, please contact us by:

- Calling us at 800.328.5600
- Emailing us via privacy@allianzlife.com
- Contacting us through the secured website www.allianzlife.com
- Writing to us at: Allianz Life Insurance Company of North America Attn: Privacy Office PO Box 59060 Minneapolis, MN 55459-0060