

## Global Atlantic Website Cookie Policy

**Last Updated:** February 6, 2023

The Global Atlantic Financial Group LLC, including its affiliates and subsidiaries, (hereinafter “Global Atlantic,” “us”, or “we”) is committed to protecting and safeguarding your privacy. Global Atlantic owns, licenses, and operates certain websites, applications and platforms (each a “**Site**”) that are primarily intended to provide our clients with the ability to access and use our financial products, tools, and services (collectively, the “**Services**”). This Cookie Policy explains our use of “cookies” and other tracking technologies, including, but not limited to, web beacons, pixels, clear gifs, and other similar technologies (collectively, “**Cookies and Other Tracking Technologies**”) that are employed on our Site.

PLEASE READ THIS COOKIE POLICY CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESSING OR USING THE SITE, YOU ARE CONSENTING TO THE TERMS OF THIS COOKIE POLICY AND THE GLOBAL ATLANTIC’S [TERMS OF USE](#) AND [PRIVACY STATEMENT](#).

### 1. WHAT ARE COOKIES AND OTHER ONLINE TRACKING TECHNOLOGIES?

Cookies are small files that are downloaded to your device when you visit a website. The cookie then sends information back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Other types of tracking technologies work similarly to cookies and place small data files on your devices or monitor your website activity to enable us to collect information about how you use our Sites. Accordingly, Cookies and Other Tracking Technologies allow our Sites to recognize your device and track your activities and preferences, thereby allowing you to navigate between pages efficiently and to generally improve the user experience. The information provided below about cookies also applies to the other tracking technologies referenced above (i.e., web beacons, pixels, clear gifs, and other similar technologies). You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

Cookies are often categorized by function. We use four types of cookies by function on our Sites:

Name	Description
Essential Cookies	These are cookies that are strictly necessary for the functioning of a website or for performing services that an individual user has requested. For instance, these cookies are necessary to allow us to operate our Sites so you may access them as you have requested. These cookies let us recognize that you have created an account and have logged into that account to access the Sites. They also include cookies that enable us to remember your previous actions within the same browsing session.
Analytical/Performance Cookies	These cookies collect information and statistics about how individuals use the Sites (e.g., which webpages or other portions of the Sites visitors go to most often). These cookies are used to improve how the Sites function.
Functional Cookies	These cookies allow the Sites to remember choices users make and to provide enhanced, personalized features. For example, within our Sites, these cookies remember users’ language preferences.

Targeting/Advertising Cookies	These cookies are used to deliver advertisements relevant to a specific user of the Sites. They remember that a user has visited a website and share this information with other organizations such as advertising vendors.
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Cookies can also be categorized by how long they remain on your device and by who puts the cookie there. There are four broad categories of duration and placement cookies that we use on the Sites:

Name	Description
Persistent Cookies	Persistent cookies remain on your device until deleted manually or automatically.
Session Cookies	Session cookies remain on your device until you close your browser, at which time they are automatically deleted.
First-Party Cookies	These cookies are placed by the party operating the website or service. For example, any cookies we place on your computer from our Sites are first-party cookies.
Third-Party Cookies	These cookies are placed on a website or service by a party that does not own or operate the website or service.

## 2. HOW DO OUR SITES USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We use Cookies and Other Tracking Technologies to identify you and your interests, to remember your preferences, to facilitate our marketing, and to track your use of our Sites. We also use Cookies and Other Tracking Technologies to control access to certain content on our Sites, to protect the integrity and security of the Sites, to process any requests that you make of us, and as otherwise set forth herein and in the Global Atlantic's [Privacy Statement](#). To administer our Sites and for research purposes, the Global Atlantic may, from time to time, contract with third-party service providers to track and analyze statistical usage and volume information from our Sites. These third-party service providers use persistent cookies to help us improve the user experience, manage the content on our Sites, and analyze how users navigate and utilize the Sites. The Cookies and Other Tracking Technologies we use on the Sites are as follows:

Cookie	Type	Description	Duration
_gcl_au	Analytics	Provided by Google Tag Manager to experiment advertisement efficiency of websites using their services.	3 months
_ga	Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitor	2 years
_gid	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.	1 day

Cookie	Type	Description	Duration
_gat_UA	Analytics	A variation of the _gat cookie set by Google Analytics and Google Tag Manager to allow website owners to track visitor behavior and measure site performance. The pattern element in the name contains the unique identity number of the account or website it relates to.	1 minutes
lidc	Analytics	Cookie used for sign-in with LinkedIn and/or for LinkedIn follow feature.	1 day
UserMatchHistory	Functional	LinkedIn sets this cookie for LinkedIn Ads ID syncing.	1 month
Ln_or	Functional	Used by LinkedIn and registers statistical data on users' behavior on a website.	1 day
AnalyticsSyncHistory	Analytics	LinkedIn set this cookie to store information about the time a sync took place with the lms_analytics cookie.	1 month
Lang	Functional	LinkedIn sets this cookie to remember a user's language setting.	Session
bcookie	Functional	LinkedIn sets this cookie from LinkedIn share buttons and ad tags to recognize browser ID.	1 year
_mkto_trk	Advertising	This cookie, provided by Marketo, has information (such as a unique user ID) that is used to track the user's site usage.	2 years
lms_analytics	Analytics	Used to identify LinkedIn Members off LinkedIn for analytics	30 days
li_sugr	Advertising	Used to make a probabilistic match of a user's identity outside the Designated Countries	90 days
lms_ads	Advertising	Used to identify LinkedIn Members off LinkedIn for advertising	30 days
gtm_isp_lookup	Analytics	This cookie, executed by the Google Tag Manager, helps identify spam and bots.	Session

**Google Ads and Analytics.** We use “Google Analytics” to collect information about use of our Sites. Google Analytics collects information such as how often users visit the Sites, what pages they visit when they do so, and what other sites they used prior to coming to the Sites. We use the information we get from Google Analytics only to improve our Sites. Google Analytics collects only the IP address assigned to your device on the date you visit our Sites rather than your name or other personal information. We do not combine the information collected through the use of Google Analytics with other personal information. Although Google Analytics plants a cookie on your web browser to identify you as a unique user the next time you visit our Sites, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to our Sites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to the Sites by disabling cookies on your browser. Google Analytics also uses electronic images known as web beacons (sometimes called single pixel gifs) which are used along with cookies to compile aggregated statistics to analyze how our Sites are used. You can find additional information on how to install a browser add-on to prevent your data from being used by Google Analytics at [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

**LinkedIn Analytics.** We use LinkedIn Analytics which are a selection of metrics that capture the performance of the websites we operate on LinkedIn. Like other social media tools, LinkedIn Analytics measures and tracks user metrics, such as our followers and visitors, and their clicks, shares, and comments. For more information, see [LinkedIn's privacy policy](#).

### **3. HOW DO WE USE AND SHARE INFORMATION?**

The information and data we gather from our Cookies and Other Tracking Technologies will be used, retained, and shared in accordance with this Cookie Policy and the Global Atlantic's [Privacy Statement](#).

### **4. REJECTING COOKIES AND YOUR OPTIONS**

You can stop cookies from being downloaded on your device by selecting the appropriate settings on your browser. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note, however, that without cookies you may not be able to access or take full advantage of the Sites. Most browsers allow users to use a "private mode" by which cookies are deleted after your website visit. Please read the help section of your browser to learn more about how to activate the "private mode." You could still visit our Sites if your browser is in "private mode"; however, the user experience may not be optimal, and some features may not work.

- [Click here](#) to learn more about the "Private Browsing" setting and managing cookie settings in Firefox.
- [Click here](#) to learn more about "Incognito" and managing cookie settings in Chrome.
- [Click here](#) to learn more about "InPrivate" and managing cookie settings in Internet Explorer.
- [Click here](#) to learn more about "Private Browsing" and managing cookie settings in Safari.

If you want to remove previously stored cookies, you can manually delete the cookies at any time. However, this will not prevent the Sites from placing further cookies on your device unless and until you adjust your browser setting as described above.

**More Information.** You can find more information about cookies, behavioral advertising, and online privacy at [www.allaboutcookies.org](http://www.allaboutcookies.org). For some of our service providers that participate in the Digital Advertising Alliance (DAA), you can exercise your choice to opt out of interest-based advertising at <http://optout.aboutads.info>. You may also opt out of receiving interest-based ads from many third-party websites and applications through the Network Advertising Initiative's (NAI) Opt Out Tool, which is available at <http://www.networkadvertising.org/choices>. Certain types of mobile devices have an identifier that provides organizations with the ability to serve targeted advertising directly to a specific mobile device, and you may (depending on the device) be able to limit advertising, reset the advertising identifier, and turn off your device's tracking features within your device's settings. For more information see <http://youradchoices.com/appchoices>.

### **5. CALIFORNIA PRIVACY**

**California Consumer Privacy Act.** Pursuant to the California Consumer Privacy Act of 2018, as amended ("CCPA"), California residents have additional data privacy rights, including the following:

- Right to Know (Specific Pieces of Personal Information). You have the right to know the specific pieces of your personal information that we have collected about you.
- Right to Know (Categories of Personal Information). You have the right to know (i) the categories of personal information we have collected from you; (ii) the categories of sources from which the personal information is collected; (iii) the categories of your personal information we have sold or disclosed for a business purpose; (iv) the categories of third parties to whom your personal information was sold or disclosed for a business purpose; and (v) the business or commercial purpose for collecting or selling your personal information.
- Right to Delete. You have the right to request that we delete your personal information that we have collected and retain.
- Right to Correct. You have the right to request that we correct inaccurate personal information that we have collected and retain.
- Nondiscrimination: The right not to be subject to discrimination for asserting your rights under the CCPA.

Limit Use of Sensitive Personal Information. GAFG does not use or disclose sensitive personal information regarding our employees, workers, contractors, and agents for reasons other than those set forth in the CCPA and therefore we do not provide individuals with the ability to limit how we use or disclose such sensitive personal information.

Submit a Privacy Request. To submit a CCPA privacy request, please email the GAFG Chief Privacy Officer, with the Subject Line entitled, "Privacy Request" at [privacy@gafg.com](mailto:privacy@gafg.com). You may also write to us at Global Atlantic Financial Company, ATTN: Chief Privacy Officer/Privacy Request, 20 Guest Street, 9th Floor, Boston, MA 02135. You may also call us at (800) 903-1452 and if you contact us by telephone, please leave your name and phone number and your call will be returned by a member of our privacy team. If you would prefer, you may designate an authorized agent to submit a CCPA privacy request on your behalf. An authorized agent must be registered with the California Secretary of State to conduct business in California

Privacy Request Verification Process. If you (or your authorized agent) make any request related to your personal information under the CCPA, GAFG will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, GAFG will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email, request certain contact information or government identifiers, and we will match at least two pieces of such personal information with data that we have previously collected from you before granting you access to, erasing, or correcting, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney pursuant to California Probate Code §§ 4121 to 4130. None of the CCPA's rights are absolute, and such rights are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA, please see: <https://oag.ca.gov/privacy/ccpa>.

Opt-Out Rights / Do Not Sell or Share My Personal Information. California residents have the right to opt out of the sale or sharing of their personal information. Global Atlantic does not sell your personal information to third parties for monetary or other valuable consideration. However, we do use third-party website analytical tools and features and marketing partners, and such relationships may involve the disclosure of your personal information for "valuable consideration" and be considered the "sharing" or personal information under CCPA. To opt out of the sharing of your personal information in these circumstances, please click on the cookie management tool (sometimes visible as a "Your Privacy Choices" or as a "Do Not Sell/Share My Personal Information" link on the footer of the website). You, or

your authorized agent, may also contact us in accordance with the “Questions or Concerns” section listed below.

WITH LIMITED EXCEPTIONS, THE CCPA DOES NOT APPLY TO PERSONAL INFORMATION COLLECTED, PROCESSED, SOLD, OR DISCLOSED PURSUANT TO THE GRAMM-LEACH-BLILEY ACT (PUBLIC LAW 106-102), AND ITS IMPLEMENTING REGULATIONS, OR THE CALIFORNIA FINANCIAL INFORMATION PRIVACY ACT (DIVISION 1.4 (COMMENCING WITH SECTION 4050) OF THE CALIFORNIA FINANCIAL CODE).

## **6. EUROPEAN UNION (EU), SWITZERLAND, AND UNITED KINGDOM (UK)**

Data Protection Rights. If you are located in the EU, Switzerland, or the UK, you have the following data protection rights:

- *Right to Know:* The right to know about what personal information Global Atlantic collects and processes about you, including the types and categories of personal information we collect and process, the sources of such personal information, our retention criteria, with whom we share your personal information, cross-border data transfers, and how to file complaints and inquiries. The personal information that we collect from you, the purposes for which it is used, the source of such personal information, and the parties to whom we share your personal information, among other issues, are set forth in this Cookie Policy and in our Privacy Statement.
- *Access Rights.* You may ask us whether we process any of your personal information and, if so, receive access to such personal information. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal information concerned as well as any other information necessary for you to exercise the essence of this right.
- *Rectification.* You have the right to have your personal information corrected/rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal information about you and, taking into account the purposes of the processing, update any incomplete personal information, which may include the provision of a supplementary statement.
- *Erasure.* You have the right to have your personal information erased, which means the deletion of your personal information by us and, where possible, any other controller to whom your data has previously been disclosed. However, your right to erasure is subject to statutory limits and prerequisites (e.g., where your personal information is no longer necessary in relation to the initial purposes for which it was processed, your personal information was processed unlawfully).
- *Restriction of Processing.* You have the right to obtain the restriction of the processing of your personal information, which means that we suspend the processing of your personal information for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal information is contested, but we need time to verify the inaccuracy (if any) of your personal information.
- *Data Portability.* You have the right to request us to provide you with your personal information in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible.
- *Right to Object.* You have the right to object to the processing of your personal information, which means you may request us to no longer process your personal information. This only applies in case the “legitimate interests” ground (including profiling) constitutes the legal basis for processing (see below “Legal Basis for Processing”). However, at any time (and free of charge) you can object to having your personal information processed for direct marketing purposes.
- *Withdrawing Consent.* You also may withdraw your consent at any time if we are solely relying on your consent for the processing of your personal information. However, this will not impact our legal basis to process such personal information prior to the withdrawal of your consent.

- *Automated Decision Making.* Global Atlantic does not engage in any activity that subjects our customers, Site users, survey participants, or others to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significantly results, impacting them.

To exercise any of these data privacy rights, please contact us, or have your designated agent contact us, in accordance with the “Questions or Concerns” section listed below. To the extent permitted by law, we will need to verify your identity (or the identity of your agent) and ensure the authenticity of your request.

Legal Basis for Processing. We process your personal information in accordance with the legal bases set forth in law. For example, our processing of personal information (as described herein) is justified based on the following legal grounds:

- *Consent.* You may consent to our use of non-essential cookies.
- *Legitimate Interests.* We process essential cookies to host, operate, maintain, and secure our Site.

Complaints. In the event you have concerns about our data processing, you have the right to file a complaint with your data protection authority:

- For data protection authorities in the EU, please see here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en).
- For the data protection authority in Switzerland, please contact the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>).
- For the data protection authority in the UK, please contact the Information Commissioner’s Office ([www.ico.org.uk](http://www.ico.org.uk)).

We would, however, appreciate the opportunity to deal with your concerns before you approach a data protection authority with a complaint, and invite you to contact us in the first instance.

## **7. COOKIE POLICY UPDATES**

We reserve the right to amend this Cookie Policy at any time. We will notify you if this Cookie Policy is amended by updating the “Last Updated” section listed above. It is your responsibility to periodically review the Cookie Policy to determine whether any amendments have been made hereto. Your use of the Sites, and continued use of the Sites after any amendments are made to this Cookie Policy, signifies your consent to this Cookie Policy and any amendments hereto. We may, in our sole discretion, provide you communications, including via email or text messages, about changes to our Cookie Policy; however, such communications do not abrogate or otherwise limit your responsibility to periodically review this Cookie Policy to determine whether any amendments have been made hereto.

## **8. QUESTIONS OR CONCERNS**

If you have any questions or concerns related to this Cookie Policy or would like to exercise any of the rights set forth herein, please email us, with the Subject Line entitled, “Privacy Request” at [privacy@gafg.com](mailto:privacy@gafg.com). You may also call us at (800) 903-1452. In the alternative, you can write to us at: Global Atlantic Financial Company, ATTN: Privacy Officer, 20 Guest Street, 9th Floor, Boston, MA 02135. To contact the Chief Information Security Officer, please email [CISO@gafg.com](mailto:CISO@gafg.com).

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