# **Privacy Statement**

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. This Privacy Statement describes how we collect and process personal information on individuals who access and use our websites and online platforms and on those individuals who are not otherwise customers of Global Atlantic.

WHEN PROVIDING OUR FINANCIAL SERVICES, GLOBAL ATLANTIC IS CONSIDERED A "FINANCIAL INSTITUTION" PURSUANT TO THE FEDERAL GRAMM-LEACH BLILEY (GLB) ACT, AND IN SUCH CIRCUMSTANCES GLOBAL ATLANTIC SHALL COLLECT, PROCESS, AND RETAIN NON-PUBLIC PERSONAL INFORMATION ON OUR CUSTOMERS AND CONSUMERS IN ACCORDANCE WITH OUR "GLOBAL ATLANTIC COMPANIES PRIVACY NOTICE" (AND NOT THIS PRIVACY STATEMENT).

PLEASE READ THIS PRIVACY STATEMENT CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESS OR USING THE GLOBAL ATLANTIC WEBSITE OR OTHERWISE PROVIDING US WITH PERSONAL INFORMATION, YOU ARE CONSENTING TO THE TERMS OF THIS PRIVACY STATEMENT.

### Scope

This Privacy Statement applies to personal information that Global Atlantic receives during its business operations as a "**data controller**" - which means we determine the purpose and means of processing such personal information. For purposes of this Privacy Statement, the term "**personal information**" means any information that, alone or in conjunction with other information or data, identifies or is linked to a natural person and that is subject to, or otherwise afforded protection under, a data protection law, statute, or regulation. The term "personal information" does not include anonymized or de-identified data that is not attributable to a particular individual, household, or device and that is not otherwise subject to a data protection law, statute, or regulation. Global Atlantic may anonymize or de-identify personal information, and such data is not subject to this Privacy Statement, and Global Atlantic may use such data for any purpose.

### **Personal Information We May Collect From You**

The nature, type, and scope of personal information that Global Atlantic collects and retains is based on the relationship we have with individuals, and the types of services we provide them. The following are examples of the personal information types, and other information that Global Atlantic collects as part of our routine business practices:

<u>The Global Atlantic Website</u>. Except for existing customers, the Global Atlantic website (www.globalatlantic.com), does not request that the user provide any type of personal or business contact information (e.g., names, telephone numbers, email addresses). The Global Atlantic website does collect and use cookie data and automated tracking tools (see below) in accordance with this Privacy Statement and the Global Atlantic Cookie Policy.

<u>Online Accounts</u>. Our existing customers, consumers, and other professionals may register and create an account to access and use our online platforms and portals. During the account registration process, we will collect personal identifiers and registration data including the following information: your title, name, company/business organization, address, email address, telephone number, usernames, passwords and Social Security Number. We will collect and use this personal information in order to verify your identity and your relationship with Global Atlantic, and to establish, maintain, and administer your online account with us. We will retain and share this personal information in accordance with this Privacy Statement.

Social Media Platforms. Global Atlantic is engaged on social media platforms (e.g., Facebook, Twitter, LinkedIn, Instagram), and you may voluntarily choose to access these platforms, or otherwise follow our activities online. We will only collect the information that you voluntarily provide to us on these platforms, and such information is generally limited to names, online identifiers, email addresses, and other contact information. Please do not post any sensitive personal information, or other information that is considered private or confidential, on our publicly available social media platforms. Additionally, we offer the ability to sign into some of our services, such as our online accounts (see above), via Facebook Connect, which will authenticate your identity and provide you the option to share certain personal information with us (e.g., name and e-mail address) to prepopulate forms and documents. For more information about Facebook Connect, please see Facebook's data policy and if you do not want data to be collected via Facebook Connect, please do not use the Facebook Connect function. Some of our social media platforms use cookie data and automated tracking tools (see below) in accordance with this Privacy Statement. These features may collect your IP

address and which website page you are accessing and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Global Atlantic website. Your interactions with these features are governed by the privacy statement of the relevant social media platform that provides them.

<u>Inquiries & Communications</u>. There may be other times that you provide Global Atlantic information about yourself or others. For example, if you communicate with Global Atlantic's helpline or a sales representative, you may provide your personal information, such as contact data (e.g., name, address, telephone, email) and other personal information related to your communication (e.g., employer, consumer preferences, and interests). We will collect the personal information that we think is reasonably necessary to your inquiry or that is otherwise related to your communication. We will collect and retain such information in accordance with the purposes you provided it, and with our legitimate business interests.

<u>Vendors and Suppliers</u>. Global Atlantic may collect and process personal information including business contact data concerning our vendors and suppliers, including their name, contact details, job title, bank account details and financial information (including credit/income history), transaction history, and communications. This personal information may relate to employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, nonprofit, or government agency) with whom we conduct, or possibly conduct, business activities. We process this information to facilitate routine and common business practices related to vendor management, contract and project development, payment and credit collection, legal compliance, accounting, litigation, and to defend our personnel, property, and interests. We generally collect this information directly from you, or from your employer. However, we reserve the right to collect general business information, such as performance reviews, from other third-parties.

<u>Job Applicants.</u> If you apply for a job with Global Atlantic, we collect information set forth in a resumé, curriculum vitae, cover letter, and similar documentation, including contact details, employment history, skills, or qualifications, educationlevel, job compensation and benefit preferences, criminal record, credit history and similar data, and information provided about or by your references.

<u>Visitor Information</u>. We collect information you provide when visiting our physical locations or premises (e.g., visitor logs and registries, vehicle and parking information).

<u>Recordings.</u> In some circumstances, we may record you via a video camera (e.g., on-premises security systems) or through video teleconferencing.

<u>Location Data</u>. We may also collect information about the general city, state, or region in which you are located when use our website.

### **Sources of Information**

We collect the personal information identified herein directly from you when you use our website, through automated means when you are using the website, and from third parties. More specifically, we collect personal information from the following sources:

<u>First Party / Direct Collection</u>. We collect personal information directly from you when you use our website (as described above) or whenever you directly engage with us, such as when you visit our offices or premises or otherwise contact us.

<u>Automated Collection.</u> As described below, we may collect information and data, such as usage data and cookies, through automated means when you use the website (see "Cookie Data and Automated Tracking Tools" below and our Cookie Policy).

<u>Third-Party Sources.</u> We collect personal information from third parties, such as publicly available databases, social networking providers, advertising companies, our vendors, suppliers, service providers, and third-party references.

### **Cookie Data and Automated Tracking Tools**

As you navigate through the Global Atlantic website, we collect certain data automatically using technical means and tools. This data relates to your device, as well as your experience on the Global Atlantic website and other websites, including the following:

<u>Usage and Device Data.</u> When you access and use the website, we automatically collect details of your access to and use of the website, including traffic data, usage logs and other communication data, and the resources that you access and use on or through the website (e.g., browsing history, search history). We may also collect information about your device and internet connection, including the device's unique identifier (e.g., device type, IMEI, Wi-Fi MAC, IP address), operating system, browser type, and mobile network information. The website may collect "diagnostic" data related to your use of the website, such as crash data and logs, performance data (e.g., launch time, hang rate, or energy use), and any other data collected for the purposes of measuring technical diagnostics.

<u>Cookies and Tracking Data.</u> We use "cookies" and other tracking technologies within the website. A cookie is a small file placed on your smartphone or other device. It may be possible to refuse to accept cookies by activating the appropriate setting on your smartphone or device. However, if you select this setting, some parts of the website may become inaccessible or not function properly. In addition, the website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us to analyze data on your use of the website (e.g., recording the popularity of certain content and verifying system and server integrity). The website may collect data about the advertisements you have seen or engaged. For more information, see, where available, the Cookie Policy on each website

<u>Site Monitoring</u>. We, and our service providers, also use cookies and other tracking technologies within the website to monitor and record any and all activities and communications to, from, and on, the website in order to safeguard, improve, and analyze usage of, the website, and for the other purposes listed in this Privacy Statement. For the avoidance of doubt, you hereby acknowledge, agree, and consent to, such monitoring and recording by us and our service providers.

## **Use and Sharing of Your Information**

If you are an existing customer of Global Atlantic, we will collect, retain, and share your personal information in accordance with our Global Atlantic Companies Privacy Notice and the "Online Accounts" section of this Privacy Statement, provided you have registered to receive access to our online portals. For all the other individuals we collect personal information from, we will use and share your personal information in accordance with the following:

For website users, we may use your information to improve the content of our website and to customize the website to your preferences.

For consumer-related inquiries and communications, we use the information you provide to us to deliver responsive information and solutions in connection with retirement, as well as life and pre-need products and services.

We may share personal information that we collect to third-party service providers and nonaffiliated companies to support our legitimate business interests, assist in our ability to satisfy our contractual obligations, and perform other support or marketing services, such as data processing and mailings.

We may share personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Global Atlantic's practice or assets, whether as a going concern or as part of

bankruptcy, liquidation, or similar proceeding, in which personal information held by Global Atlantic would be among the assets transferred.

We may share personal information to comply with any court order, law, or legal process, including to respond to any government or regulatory request; to enforce or apply our terms of use and other agreements, including for billing and collection purposes; and, if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Global Atlantic or others.

We may share personal information for any other purpose for which we have your consent, or to fulfill the purpose(s) for which you provide the information to us. In the event that you facilitate a transaction with Global Atlantic, or request information from or otherwise engage with us, and such activities require Global Atlantic to share your personal information with a service provider or other third party, you hereby consent to such disclosure and/or direct Global Atlantic to intentionally disclose your personal information to the service provider or third party.

#### **Protecting Personal Information**

To protect your information from unauthorized access and use, we have adopted security measures that comply with applicable law, and are reasonably designed to protect the availability, confidentiality, and integrity of your personal information. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any electronic transmission of personal information (e.g., over the Internet) is at your own risk, and Global Atlantic is not responsible for circumvention of any privacy settings or security measures contained on its website. TO THE EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT OR EVENT THAT MAY COMPROMISE THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL INFORMATION CAUSED BY A THIRD PARTY. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a user name and password to access our websites or online accounts, you are responsible for maintaining the security and confidentiality of those credentials. You must immediately contact us if you know, or have reason to suspect, that your user name or password to our website or online account has been compromised or otherwise subject to unauthorized access, use, or disclosure. You acknowledge and agree that we may contact you via email or other electronic communications in the event we are legally required to notify you of a data security incident or event related to your personal information.

### **Information Stored in the United States**

Global Atlantic is headquartered in the United States, and the information (including personal information) that we collect is most often stored, and retained, in the United States. If you are located outside of the United States, please be aware that information you submit will be transferred to the United States, and that the United States may not provide the same level of protections as the laws in your country of residence. By continuing to provide us such information you hereby consent to this transfer.

#### **Retention of Personal Information**

Global Atlantic retains your personal information for the time period reasonably necessary to satisfy the purpose it was collected for, or as long as necessary to comply with legal obligations, or for the establishment, exercise, or defense of a legal claim. Generally, we retain your personal information for the duration needed to complete, or facilitate, a contract, agreement, or engagement, and for a reasonable amount of time thereafter in accordance with our legitimate business needs and functions, or in compliance with applicable laws.

### **Third-Party Websites**

We wish to remind you that this Privacy Statement applies to personal information that you provide to Global Atlantic, whether voluntarily or automatically when using our online services. It does not apply to any links to a third-party's website and/or online services, such as third-party applications, that you may encounter when using use our website services. We encourage you to carefully familiarize yourself with privacy policies applicable to any websites and/or services operated by third-parties. Please be aware that we are not responsible for the privacy practices of any third-parties.

#### Marketing

You have the right to opt-out of receiving electronic direct marketing communications from us. All electronic direct marketing communications that you may receive from us, such as e-mail messages, will give you an option of not receiving such communications from us in the future. You may also unsubscribe from such email marketing by contacting us in accordance with the "Questions or Concerns" section listed below. You hereby agree to immediately notify Global

Atlantic, in writing, in the event you no longer own, license, or use an email address to which you subscribed to receive email marketing from us.

## **California Privacy Rights**

<u>Shine the Light Law</u>. Pursuant to California's "Shine the Light" law, California residents who provide personal information (as defined in the applicable statute) to obtain products or services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the personal information we shared, if any, with other businesses for marketing uses. Global Atlantic does not, at any time, share your personal information with a third-party with whom we know, or have reason to believe, uses the personal information to undertake independent direct marketing.

<u>California Consumer Privacy Act</u>. 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.

<u>Submit a Privacy Request</u>. To submit a CCPA privacy request, please email the GAFG Chief Privacy Officer, with the Subject Line entitled, "Privacy Request" at <u>privacy@gafg.com</u>, or you may 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 submit a request through our webform found <u>here</u>, or 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.

<u>Opt-Out Rights / Do Not Sell or Share My Personal Information.</u> 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 "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).

### **Nevada Privacy Rights**

Global Atlantic does not currently conduct "sales" of personal information for purposes of Nevada law. Notwithstanding the foregoing, Nevada residents may submit a request directing us to not sell personal information we maintain about them to third parties who will sell or license their information to others. If you would like to exercise this right, please contact us in accordance with the "Questions or Concerns" section listed below.

## **General Data Protection Regulation**

If you are located in the European Union (EU), Switzerland, or the United Kingdom (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. Such information is set forth in this Privacy Statement.
- *Automated Decision Making*. Global Atlantic does not engage in any activity that subjects our customers, website 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.
- *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.

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.

<u>Legal Basis for Processing</u>. 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*. Processing is based on your consent (e.g., you register to receive our marketing materials, you voluntarily contact us).
- *Legitimate Interests*. Processing is necessary for our legitimate interests as set out herein (e.g., monitoring your use of the website and your compliance with the terms and conditions governing the same, improving our Services).
- *Contract Undertaking*. Processing is necessary for the performance of a contract to which you are a party (e.g., you purchase or consider purchasing our Services).
- *Legal Compliance*. Processing is required to comply with a legal or statutory obligation (e.g., tax disclosures).

<u>Complaints</u>. 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: <u>https://edpb.europa.eu/aboutedpb/about-edpb/members en</u>. For the data protection authority in Switzerland, please contact the Federal Data Protection and Information Commissioner (<u>https://www.edoeb.admin.ch/edoeb/en/home.html</u>). For the data protection authority in the UK, please contact the Information Commissioner's Office (<u>www.ico.org.uk</u>). 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.

## **Children's Privacy**

Our website is not directed to children under eighteen (18) years of age, and we do not intend to collect personal information from minors. By using this website, or otherwise engaging with Global Atlantic, you represent and warrant to Global Atlantic that you are over the age of eighteen (18).

## **Do Not Track**

Some browsers have a "Do Not Track" feature, which permits you to inform websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Unless required by law, Global Atlantic's website does not respond to "Do Not Track" browser requests.

## **Persons with Disabilities**

Global Atlantic strives to ensure that every person has access to information related to our Services, including this Privacy Statement. Please contact us if you would like this Privacy Statement provided in an alternative format, and we will seek to meet your needs.

### **Employment Applications and Talent Management**

As part of our recruitment and talent management process, we collect personal information with respect to individuals who are interested in working for us. In this context, we collect employment and application data, such as the following: contact information (e.g., name, title, residential or postal address, telephone number, and personal email address); information in a curriculum vitae, resumé, cover letter, or similar documentation; details regarding the type of employment sought, willingness to relocate, job compensation and benefit preferences; health data (e.g., medical conditions); information related to your background, education, criminal record, credit history and similar data; information provided about or by your references or other third parties related to your employment history, skills, qualifications, or education; and information related to previous applications to us or previous employment history with us. When permitted by law, we may collect information about your race and ethnicity to assist with our diversity and inclusion programs. We use this information for the following purposes: to identify and evaluate job applicants; to verify your information; to complete employment, education, background and reference checks; to communicate with you about the recruitment process and your application; to comply with our legal, judicial, regulatory, administrative, or other corporate requirements; to analyze and improve our application and recruitment process; to accommodate individuals who may have specialized needs during the employment process; and to protect the rights, interests, and property of our business, other job applicants, employees, or the public, as required, or permitted, by law. We share this personal information with third parties (see "Use and Sharing of Your Information"), and we may also use this employment and application data for any other purpose set forth in this **Privacy Statement.** 

## **Your Responsibilities**

With regard to any personal information that you provide Global Atlantic, regardless of whether that personal information relates to you or a third-party, you must ensure, on a continuing basis that (i) such personal information is accurate, relevant, and complete, (ii) you have the lawful basis to provide us with such personal information, and (iii) you have provided information related to this

Privacy Statement to, and/or received consent from, any third party whose personal information you have provided us. In certain circumstances, you may have the ability to directly edit your account to update and change your personal information (e.g., name, telephone number), and you must do so when such changes are warranted. If your account does not contain such features, then you must directly notify Global Atlantic of any changes or updates to your personal information in accordance with the "Questions or Concerns" section listed below.

PERSONAL INFORMATION IF YOU PROVIDE (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO GLOBAL ATLANTIC, YOU EXPRESSLY REPRESENT AND WARRANT TO GLOBAL ATLANTIC THAT YOU HAVE THE FULL RIGHT AND AUTHORITY TO PROVIDE GLOBAL ATLANTIC WITH SUCH PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) AND THAT GLOBAL ATLANTIC 'S USE AND PROCESSING OF SUCH PERSONAL INFORMATION AS SET FORTH HEREIN WILL NOT VIOLATE ANY PERSON'S RIGHTS OR PRIVILEGES, INCLUDING RIGHTS TO PRIVACY. YOU HEREBY AGREE TO FULLY AND COMPLETELY INDEMNIFY GLOBAL ATLANTIC FOR ANY CLAIMS, HARM, OR DAMAGES THAT MAY ARISE FROM YOUR PROVISION OF PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO GLOBAL ATLANTIC.

## **Questions or Concerns**

If you have any questions or concerns related to this Privacy Statement or would like to exercise any of the rights set forth herein, please email us, with the Subject Line entitled, "Privacy Request" at <u>privacy@gafg.com</u>. 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 <u>CISO@gafg.com</u>.

# Last Updated

This Privacy Statement was last updated on November 7, 2023. We may update this Privacy Statement from time to time, and we will, when required by law, notify you of such changes or updates. The updated policy will be posted on our website and your continued use of the website after we post a revised policy signifies your acceptance of the revised policy.