

# Commitment to Privacy

At CNO Financial Group, our business is built on trust and promises. We respect our customers' privacy and we take our responsibility to protect the information entrusted to us very seriously. Our commitment to privacy and data protection is built on these values and principles.

**Trust.** We collect, use and disclose personal information in a manner that is ethical and responsible; we process personal information only as needed for legitimate business purposes and use it for the reason it was collected; we obtain explicit consent where required and we honor our customers' privacy rights and preferences.

**Transparency.** We communicate clearly how personal information is collected, used and disclosed.

**Safety.** We use leading security data protection practices throughout our business processes and systems to safeguard the personal information that has been entrusted to us and ensure that access to personal information is limited to "need to know."

**Accountability.** Our privacy practices are overseen by a dedicated privacy office, led by our chief privacy officer, that sets and maintains CNO's privacy program.

## HOW WE COLLECT, USE AND RETAIN PERSONAL DATA

Personal information or personal data refers to any information that can be used to identify someone, such as a name, postal address, email address, telephone number, birthdate, Social Security number or policy number.

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*We will only collect personal information in fair and lawful ways that are required for or related to running our business, such as for providing products and services, to better understand customer needs and complying with contractual and legal obligations.*

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We collect personal data from various sources in connection with providing insurance and financial services products, but mostly directly from you or your employer. You provide personal data when you meet with an agent, apply for insurance, make a claim, or ask us to perform a policy transaction. We may ask for your name, contact information, birth date, gender and other information that identifies you as a distinct individual. We may need your Social Security number so that we can correctly identify you. Depending on the type of coverage you apply for, we may also ask about your past or present health status, financial assets or other identifying data.

We may collect personal information from third parties if it is required to determine your eligibility for coverage or to process a claim. We may also ask about your other insurance coverage, such as coverage levels or payment history. We ask for your written permission to obtain this information.

Mostly we use your personal information to issue and service your coverage with us, such as to pay claims or to conduct quality assessment and customer service improvement activities, or in connection with risk management and business planning functions. If permitted by law, we may also use personal information associated with your insurance coverage to identify other products or services that may interest you.

### ***Children***

We do not knowingly collect or use the personal information of children, except when provided by a child's parent or legal guardian in connection with issuing or administering insurance. Our websites and content are not directed toward or intended to be used by children under the age of 16. If we are made aware that we have collected personal information for someone under the age of 16 other than in connection with administering a specific insurance policy, we will delete this information as soon as possible.

### ***Information Use***

Below is a summary of how CNO companies may use personal information:

- To communicate with you and to respond to correspondence from you.
- To register you as a new client or supplier or issue and administer your insurance coverage.
- To manage our relationship with you.
- To help ensure the quality of our services.
- To administer our business and protect our networks and information systems.
- To conduct direct marketing about our products and services, events to attend or industry updates or articles that may be of interest to you.
- To use data analytics to improve our websites, marketing, client relationships and experiences.
- To detect and prevent fraud and abuse.
- To comply with legal, regulatory and contractual obligations.

### ***Information Retention***

We retain personal information for as long as it is needed to fulfill the purpose for which it was collected, including for the purpose of satisfying any legal and contractual requirements. We will continue to safeguard our customers' personal information for as long as we retain it.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, and the purposes for which personal data is processed, as well as applicable legal requirements, contractual obligations and technical capabilities.

### ***Online Interactions***

We may collect information known as "Internet Data." For example, we use logging information and analytics tools to capture information about our site usage, pages viewed, applications used, files downloaded, browser type, the user's internet service provider (ISP), and the user's type of device and/or device operating system. We use Internet Data to maintain and improve our website(s). We also use cookies on our sites. Cookies are small text files that are stored within your computer's memory. These files are used

to facilitate your navigation throughout the website(s). Cookies may be required to gain access to the secured areas of the website(s). Access to these secured areas may not be available if the cookie is rejected. We use this information to track trends and behavior, such as the date and time of visits, pages viewed, time spent at the site, and the sites visited just before and after visiting our website(s). We may also use cookies to make your visit to our website(s) more convenient. We may also use technologies, such as cookies, to provide you with personalized online display advertising tailored to your interests.

You can set your browser to refuse some or all browser cookies or to alert you when websites set or access cookies. We respect user-established privacy controls and configure our websites to recognize Global Privacy Control (GPC) signals where possible.

## **HOW WE SHARE PERSONAL DATA**

We share personal data as necessary to provide our services and respond to our customers' requests.

We may disclose personal information to other CNO companies, or nonaffiliated companies as allowed by law for everyday business purposes, such as to administer insurance products, to protect the security of our records and information systems, to meet legal or regulatory requests, or to follow state, federal or local laws (such as for public health purposes, to report abuse or neglect, or to comply with a court order). In the event we are required to disclose personal information to respond to lawful requests from public authorities or regulators, or in connection with a legal process, we act responsibly and take account of our customers' interests when responding to any such requests.

We may also make limited disclosures of your personal information to individuals involved in your care if you are incapacitated or in an emergency, if we believe the disclosure would be in your best interest.

We may also use third-party vendors and service providers to perform services on our behalf. Third parties that have access to customers' personal information are required to adhere to strong privacy and security standards. Furthermore, such third-party vendors and service providers have access to personal data only to the extent necessary to perform their function and may not use or disclose it for any other purpose.

We take appropriate steps to ensure that such third parties treat your personal information with the same care that we do. Where third-party service providers receive your information, we remain responsible for the use of your personal data.

## **HOW WE SECURE PERSONAL DATA AND RESPECT PRIVACY RIGHTS AND CHOICES**

### ***Data Protection Practices***

We take the protection of personal data very seriously. We maintain technical and organizational measures to protect personal data from loss, misuse, unauthorized access, or disclosure, alteration or destruction. We have policies, procedures and training designed to keep personal information safe and secure.

Our information security program aligns with the National Institute of Standards and Technology's (NIST) Cybersecurity Framework. This is a collection of standards, guidelines and practices to promote the protection of critical infrastructure.

CNO's information security strategy and the NIST cybersecurity framework guide the decisions and actions of our information security program. We have put in place strong procedures to detect, investigate and respond to potential data breaches.

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*We believe in transparency. In the event of a data breach, CNO is committed to ensuring that affected individuals are notified promptly in strict compliance with applicable laws.*

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We continually monitor for potential threats and vulnerabilities to our network through a dedicated security operations center that operates 24/7. Through our operations center, we conduct regular vulnerability analyses across the enterprise using an automated process. We also perform ongoing, rigorous tests and exercises to continually improve our incident response capabilities.

Our privacy and information security programs, policies and practices are regularly assessed.

### **Respecting Our Customers' Privacy Rights And Choices**

CNO is committed to honoring our customers' individual privacy rights and choices. As a customer, you have choices about how we communicate with you, and whether to receive marketing communications, as well as the right to access, correct or amend the information associated with your policy.

#### **Opting out and other communication preferences and choices**

We have procedures in place for customers to request that we communicate with you about your coverage. You may ask us to communicate with you in a different way, such as directing your mail to a post office box. Please ask us in writing. We will consider all reasonable requests but must say "yes" if you tell us that disclosure of all or part of your personal information could place you in danger. Your request for highly confidential handling should be signed by you or your legal representative.

#### **Right to know**

We provide privacy notices and disclosures at multiple points in our relationship with a customer. CNO is transparent about how personal data is collected and processed before it engages in collecting or processing customer data. Customers may also receive privacy notices or disclosures that apply to specific types of products or that are required for compliance with state or federal regulatory requirements.

#### **Access**

Customers have the right to request access to see or receive a copy of the personal information we maintain about you in connection with your insurance coverage. Please ask us in writing. We will need your full name, mailing address and policy number(s). Your request should be signed by you or your legal representative.

#### **Correction or amendment**

As a customer, if you believe any personal information we have collected from or about you is inaccurate, you have the right to ask us to correct that information. Please ask us in writing. We will need your full name, mailing address and policy number(s). We will investigate your request and make appropriate changes as needed. Your request should be signed by you or your legal representative. If we are unable to accommodate your request, we will explain why in writing and let you know how to submit a complaint to us or regulatory agencies.

**Disclosures to external parties**

Upon request, we provide our customers with information about the types of service providers and other third parties with whom their personal data may have been shared. Please ask us in writing. We will need your full name, mailing address, policy number(s) and the time period of your request. Your request should be signed by you or your legal representative.

**Marketing communications**

We are enthusiastic about our products and services. We want to share the right product with the right person at the right time, and we respect that our customers have diverse communication preferences. We have strong procedures to monitor compliance with state and federal Do Not Call requirements and require prior consent before contacting individuals who have opted out from telemarketing communications. We have similar procedures to collect and honor email unsubscribe preferences. Further, pursuant to financial privacy regulations, we have procedures in place to allow customers to opt out of internal or external information sharing for marketing purposes.

**Right to file a complaint**

If you have a privacy-related complaint, please let us know in writing so we can address your concern. Please write to us at P.O. Box 2031, Carmel IN 46082-2031. You may also file a complaint with (1) a state department of insurance or (2) the Secretary of the U.S. Department of Health and Human Services in Washington, D.C., within 180 days of the conduct. We will not retaliate against anyone for exercising a privacy right, expressing a concern or filing a complaint either with us or a regulatory authority.

**CONTACT US**

*If you have questions or comments about CNO's Commitment to Privacy, please contact us at [Privacy@CNOinc.com](mailto:Privacy@CNOinc.com).*