

Privacy Notice Supplement for California Residents

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VENERABLE®

This Privacy Notice Supplement for California Residents ("Supplement") supplements the Venerable Insurance and Annuity Company ("VIAC") Privacy Notice available at www.venerable.com (our "Privacy Notice") and applies to the personal information that is subject to the California Consumer Privacy Act of 2018, as amended ("CCPA"). As used in this supplement, "personal information" means information as defined in the CCPA and not otherwise excluded by the CCPA.

Categories of personal information we collect	The amount and types of personal information we collect will vary depending on the nature of your relationship and your interactions with us, and on the products and services that we provide to you. The length of time we retain your personal information depends on the products and services you request from us and our obligations under applicable laws. The categories of personal information we collect are: • Personal identifiers, such as your name, postal address, and email address; and government identifiers, such as social security, driver license, state identification, passport number; • Information covered by California's records-destruction law (California Civil Code § 1798.80), such as your signature, telephone number, and financial account information; • Commercial information, such as records of the products and services we have provided to you and transactions in your account; • Characteristics of protected classification under California or federal law, such as your race, national origin or ancestry, sex, age, and citizenship; • Biometric information, such as when you use our voice-recognition service that we use for security purposes; • Internet and other electronic network activity information, such as information regarding your interactions with our websites and applications; • Geolocation data; • Professional or employment-related information; • Education information; • Account access credentials, such as usernames, account numbers, or card numbers combined with required passwords; and • Health information.
How we collect your personal information	Depending on the nature of your relationship and your interactions with us, and on the products and services that we provide to you, we may obtain personal information from the following sources: • You or your representative when interacting with us or any of our websites or mobile applications, such as through page clicks, time spent, or other automatically collected meta-data like cookies; • You or your representative when otherwise communicating with us, such as interactions with customer service staff over the telephone or electronic communications; • Transactional activity on your account, such as payment history; • You or your employer or plan sponsor if VIAC provides them with recordkeeping and/or benefits advisory services, such as payroll, human resources, or benefits information; • Third parties that perform services for us or on our behalf; and • Information from consumer reporting agencies.
Why we collect personal information	The business purposes for which we collect personal information include the provision of financial products and services (e.g., maintaining accounts, processing payments, servicing customers), auditing consumer interactions and transactions, detecting security incidents and preventing fraud, identifying and repairing errors that impair functionality, activities to verify or enhance the quality of services, and other internal uses permitted under applicable laws.

Sharing personal information with third parties	All financial companies need to share personal information to run their everyday business. The categories of third parties with which VIAC shares personal information include service providers, third party administrators, brokers, independent agents, plan sponsors, managing general agents, program administrators and affiliates. If you are a participant in a retirement plan sponsored by your current or former employer, our contract with your plan sponsor may contain additional restrictions on the use or sharing of your personal information.
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WE DO NOT SELL PERSONAL INFORMATION

California Consumer Rights under the CCPA/CPRA

If you are a resident of California, you may have some of the following rights. Please note that some or all of these rights may not apply to you or may apply only for some of your personal information.

Right to Know	You have the right to know what personal information we collect about you, why we collect your personal information, where we source that personal information, and who we share your personal information with.
Right to Delete	You have the right to request that we delete your personal information.
Right to Correct	You have a right to request that we correct any inaccuracies in the personal information we maintain about you.
Right to Opt-Out	You have the right to direct a business not to sell your personal information or share your personal information for behavioral advertising. VIAC DOES NOT SELL PERSONAL INFORMATION OR SHARE PERSONAL INFORMATION FOR BEHAVIORAL ADVERTISING.
Restrict Sensitive Information Processing	You have the right to restrict how a business uses and discloses your sensitive information that is collected or processed for the purpose of inferring characteristics about you.
Nondiscrimination	We will not discriminate against you for exercising any of the rights listed above.

How to exercise your CCPA rights

To submit a request to exercise your individual rights, Call the telephone number listed on your statements and other correspondence or click here: <https://venerable.clarip.com/dsr/create>

You may designate an authorized agent to make a request on your behalf. Your authorized agent can submit requests by calling the phone number or clicking the hyperlink above. Authorized agents must provide written permission to submit a request on an individual's behalf signed by the individual to whom the request relates.

In connection with your request, VIAC will verify your request and your identity using our normal procedures, and we will make you aware of any additional information that we will need you to provide so that we can process your request.

Depending on the nature of your relationship and interactions with VIAC, and on the products or services provided to you through that relationship, some or all of your personal information that VIAC maintains may be covered by one or more exemptions from the CCPA. For example, if you interact with VIAC solely to receive personal financial services, the personal information collected and processed about you may be subject to the federal Gramm-Leach-Bliley Act ("GLBA"). As result, in some cases, VIAC may have no obligation to accept a CCPA request or may refuse your request.

If your personal information is collected, maintained, or processed by another business, VIAC may have no information relevant to your CCPA request and will instruct you on where to direct your request.

Contact Information

Call the telephone number listed on your statements and other correspondence.