

## **NOTICE FOR CALIFORNIA RESIDENTS**

### ***Customers or Prospective Customers***

This NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in National Life Group's Privacy Notice to our Customers. As a life insurance company, National Life Group is subject to the federal Gramm-Leach-Bliley Act, and implementing regulations (collectively, "GLBA") and similar state laws, including the California Financial Information Privacy Act (Division 1.4 (commencing with Section 4050) of the California Financial Code) ("CFIPA"). This notice applies to California Residents, as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017. We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), specifically Section 1798.100. However, pursuant to Section 1798.145(e) of the CCPA, with the exception of Section 1798.150, the CCPA does not apply to personal information collected, processed, sold, or disclosed pursuant to the GLBA or the CFIPA. Any terms defined in the CCPA have the same meaning when used in this notice. We do not sell information about our customers or prospective customers.

### ***Producers or Prospective Producers***

This NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in National Life Group's internal privacy policy. This notice is directed to any producer or prospective producer who is a California Resident, as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017. We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), specifically Section 1798.100(b). We do not sell information about our producers or prospective producers.

### ***Employees or Prospective Employees***

This NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in National Life Group's internal privacy policy. This notice is directed to any employee or prospective employee who is a California resident, as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017. We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), specifically Section 1798.100(b). We do not sell information about our employees or prospective employees.

### ***Non-Customer Visitors to [Nationallife.com](http://Nationallife.com)***

This NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in National Life Group's Privacy Notice to our Customers. As a life insurance company, National Life Group is subject to the federal Gramm-Leach-Bliley Act, and implementing regulations (collectively, "GLBA") and similar state laws, including the California Financial Information Privacy Act (Division 1.4 (commencing with Section 4050) of the California Financial Code) ("CFIPA"). This notice applies to California Residents, as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017. We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), specifically Section 1798.100. However, pursuant to Section 1798.145(e) of the CCPA, with the exception of Section 1798.150, the CCPA does not apply to personal information collected, processed, sold, or disclosed pursuant to the GLBA or the CFIPA. Any terms defined in the CCPA have the

same meaning when used in this notice. We do not sell information about our customers or prospective customers.

**Information We Collect and the Purposes for Which It Is Collected**

Life Insurance Company of the Southwest (“LSW”) and National Life Insurance Company (“NLIC”) (herein referred to as the “Company”) collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular customer or household, producer or prospective producer, employee or prospective employee (“personal information”).

***Customers or Prospective Customers***

The Company will collect the following categories of personal information from you when it sells you products or services or you apply to the Company for products or services:

Category	Specifics
<p>A. Identifiers – including personal information under California’s Customer Records law (Cal. Civ. Code 1798.80(e))</p>	<ul style="list-style-type: none"> <li>• Name (first, middle, last) or alias</li> <li>• Signature</li> <li>• Physical characteristics or description</li> <li>• Phone number – including home, cell, &amp; work</li> <li>• Fax number</li> <li>• Gender</li> <li>• Date of birth (“DOB”)</li> <li>• Age</li> <li>• Home address</li> <li>• Unique personal identifier</li> <li>• Insurance policy number</li> <li>• Online identifier Internet Protocol (“IP”) address</li> <li>• Email address</li> <li>• Social Security Number (“SSN”)</li> <li>• Tax identification number</li> <li>• Alien registration number</li> <li>• Permanent resident card number – including a photo copy of the actual card</li> <li>• Type of visa – including a photo copy of the actual visa</li> <li>• Driver’s license or state identification number</li> <li>• Passport number</li> <li>• Owner/annuitant/beneficiary information – name, relationship, address, telephone number, email address, DOB, &amp; SSN</li> <li>• Moving vehicle violations</li> <li>• Criminal history information</li> <li>• Existing policy information – including exiting company name, policy number, product name, &amp; other product specifics</li> </ul>

	<ul style="list-style-type: none"> <li>• Legal documents – including power of attorney &amp; trust documents</li> <li>• Children’s Term Rider information – including child’s name, DOB, SSN, medical information, &amp; medications</li> </ul> <p style="text-align: center;">(Some personal information included in this category may overlap with other categories)</p>
<p>B. Financial Information</p>	<ul style="list-style-type: none"> <li>• Income – including household</li> <li>• Net worth</li> <li>• Expenses – including household</li> <li>• Liquid net worth</li> <li>• Asset distribution amounts</li> <li>• Liability distribution amounts</li> <li>• Existing investment holdings</li> <li>• Existing life insurance holdings</li> <li>• Tax bracket</li> <li>• Tax return documents</li> <li>• Risk tolerance</li> <li>• Source of funds</li> <li>• Bank information – including bank name, name on account, account number, routing number, account type, depositor’s mailing address, depositor’s email, depositor’s phone number, &amp; depositor’s signature</li> <li>• Credit or debit card number</li> <li>• Bankruptcy information</li> </ul>
<p>C. Characteristics of protected classifications under California or Federal law</p>	<ul style="list-style-type: none"> <li>• Age</li> <li>• National origin/place of birth</li> <li>• Citizenship</li> <li>• Foreign National information – including intent to reside in the United States (U.S.), U.S. property interests, U.S. connections, U.S. business interest, and travel plans</li> <li>• Marital status</li> <li>• Medical condition</li> <li>• Physician &amp; Specialist name, dates last seen, reasons consulted and outcome</li> <li>• Physical or mental disability</li> <li>• Prescribed Medications</li> <li>• Sexual orientation</li> <li>• Veteran or military status – including military branch, rank, occupation, special forces, military occupation specialty, date of next enlistment, orders for deployment, special pay, aviation, mission types, medical leave, &amp; post-traumatic stress disorder information</li> <li>• Genetic information</li> </ul>
<p>D. Commercial information</p>	<ul style="list-style-type: none"> <li>• Records of personal property, products, or services purchased, obtained, or considered</li> </ul>

	<ul style="list-style-type: none"> <li>• Other purchasing or consuming histories or tendencies</li> </ul>
E. Biometric information	<ul style="list-style-type: none"> <li>• Medical and health information – including family history</li> <li>• An individual’s physiological, biological or behavioral characteristics</li> <li>• Voice recordings from service phone calls</li> </ul>
F. Internet or other electronic network history	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Information regarding a customer’s interaction with the Company’s website</li> </ul>
G. Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> <li>• Voice recordings from service phone calls</li> </ul>
H. Professional or employment-related information	<ul style="list-style-type: none"> <li>• Occupation – with specific duties</li> <li>• Employer information – including name, address, contact name, phone number, fax number, email address, website, and Third-Party Administrator information</li> <li>• Years of service</li> <li>• Salary</li> <li>• Work history – including number of hours, prior disability and/or worker’s compensation applications</li> </ul>
I. Inferences drawn from other personal information	<ul style="list-style-type: none"> <li>• Avocation, aviation, and foreign travel experience and plans (if applicable)</li> <li>• Tobacco usage (if applicable)</li> <li>• Drug and alcohol usage (if applicable)</li> </ul>

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information applying for an insurance policy or an annuity, we will use that information to approve or deny the application for that policy or contract. If we offer you life insurance, we will also use that information in the underwriting process to determine the cost of that insurance.
- To provide you with information, products or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including billing, notifications, and claims.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

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.

***Producers or Prospective Producers***

The Company will collect the following categories of personal information you when you apply to become a producer for the Company or in your capacity as a producer for the Company:

Category	Specifics
<p>A. Identifiers – including personal information under California’s Customer Records law (Cal. Civ. Code 1798.80(e))</p>	<ul style="list-style-type: none"> <li>• Name (first, middle, last)</li> <li>• Aliases (if any)Maiden name (if any)</li> <li>• Signature</li> <li>• Phone number – including home, cell, &amp; work</li> <li>• Date of birth (“DOB”)</li> <li>• Age</li> <li>• Home address</li> <li>• Business address</li> <li>• Online identifier Internet Protocol (“IP”) address</li> <li>• Email address</li> <li>• User name, password, security code, and recovery questions</li> <li>• Social Security Number (“SSN”)</li> <li>• Tax identification number</li> <li>• Criminal history information</li> </ul> <p style="text-align: center;">(Some personal information included in this category may overlap with other categories)</p>
<p>B. Financial Information</p>	<ul style="list-style-type: none"> <li>• Income</li> <li>• Existing investment holdings – if a Registered Representative</li> <li>• W-9 tax withholding information</li> <li>• Bank information – including bank name, bank address, name on account, account number, routing number, and account type</li> <li>• Bankruptcy information – if a Registered Representative</li> </ul>
<p>C. Characteristics of protected classifications under California or Federal law</p>	<ul style="list-style-type: none"> <li>• Age</li> <li>• Citizenship</li> </ul>
<p>D. Commercial information</p>	<ul style="list-style-type: none"> <li>• Records of rental properties – if a Registered Representative</li> </ul>
<p>E. Biometric information</p>	<ul style="list-style-type: none"> <li>• Voice recordings from service phone calls</li> <li>• Fingerprints – if a Registered Representative with Equity Services, Inc.</li> </ul>
<p>F. Internet or other electronic network history</p>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Computer operating system</li> <li>• Internet service provider domain name</li> <li>• Information regarding a producer’s or prospective producer’s interaction with the Company’s website or digital tools</li> </ul>

<p>G. Audio, electronic, visual, thermal, olfactory, or similar information</p>	<ul style="list-style-type: none"> <li>• Voice recordings from service phone calls</li> </ul>
<p>H. Professional or employment-related information</p>	<ul style="list-style-type: none"> <li>• Employer information – including job title, name, address, contact name, phone number, and reason for leaving</li> <li>• Prior employer information</li> <li>• Years of service</li> <li>• Salary/Commission</li> <li>• Complaints received</li> <li>• Named party in litigation, arbitration, or civil actions</li> <li>• Court and legal documents (if applicable)</li> <li>• Federal or state regulatory agency violations</li> <li>• Named party in an unsatisfied judgments or liens (if applicable)</li> <li>• FINRA or state licensing information</li> <li>• Professional designations held</li> <li>• Sales Production – including last payout and assets under management</li> <li>• Heightened supervision – up to, and including, for cause terminations</li> <li>• License suspension</li> <li>• Errors and Omissions insurance information</li> </ul>
<p>I. Inferences drawn from other personal information</p>	<ul style="list-style-type: none"> <li>• Outside business activities – if a Registered Representative</li> </ul>

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you apply to become appointed with the Company, we will use that information to approve or deny the appointment request to the extent permissible under applicable law.
- To provide you with information, products or services that you request from us.
- To appoint you as a producer.
- To carry out our obligations and enforce our rights arising from any appointment contracts entered into between you and us.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

The Company will not collect additional categories of personal information or use the personal information we collected for additional purposes without providing you notice.

**Employees or Prospective Employees**

The Company will collect the following categories of personal information you when you are acting as a job applicant to become an employee of the Company or in your capacity as an employee of the Company:

Category	Specifics
<p>A. Identifiers – including personal information under California’s Customer Records law (Cal. Civ. Code 1798.80(e))</p>	<ul style="list-style-type: none"> <li>• Name (first, middle, last)</li> <li>• Aliases (if any)</li> <li>• Maiden name (if any)</li> <li>• Signature</li> <li>• Phone number – including secondary or alternative numbers</li> <li>• Gender</li> <li>• Date of birth (“DOB”)</li> <li>• Age</li> <li>• Home address</li> <li>• Address history</li> <li>• Online identifier Internet Protocol (“IP”) address</li> <li>• Email address</li> <li>• Password</li> <li>• Social Security Number (“SSN”)</li> <li>• Other Country ID – such as an alien registration number, permanent resident card number, visa, passport number</li> <li>• Beneficiary information – name, relationship, address, telephone number, email address, DOB, &amp; SSN</li> <li>• Emergency Contact information – name, relationship, &amp; phone number</li> <li>• Criminal history information</li> </ul> <p style="text-align: center;">(Some personal information included in this category may overlap with other categories)</p>
<p>B. Financial Information</p>	<ul style="list-style-type: none"> <li>• Income</li> <li>• Existing investment holdings – if a Registered Representative</li> <li>• Tax bracket</li> <li>• W-2 Wage and Tax statements</li> <li>• Bank information – including bank name, name on account, account number, routing number, account type, depositor’s mailing address, depositor’s email, depositor’s phone number, &amp; depositor’s signature</li> <li>• Bankruptcy information – if a Registered Representative</li> </ul>
<p>C. Characteristics of protected classifications under California or Federal law</p>	<ul style="list-style-type: none"> <li>• Age</li> <li>• Visa Sponsorship</li> <li>• Citizenship</li> <li>• Marital status</li> </ul>

	<ul style="list-style-type: none"> <li>• Medical condition</li> <li>• Veteran or military service</li> <li>• Genetic information</li> </ul>
D. Commercial information	<ul style="list-style-type: none"> <li>• Records of rental properties – if a Registered Representative</li> </ul>
E. Biometric information	<ul style="list-style-type: none"> <li>• Medical and health information</li> <li>• An individual’s physiological, biological or behavioral characteristics</li> <li>• Fingerprints – if a Registered Representative</li> </ul>
F. Internet or other electronic network history	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Computer operating system</li> <li>• Internet service provider domain name</li> </ul>
G. Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> <li>• Voice recordings from phone calls</li> <li>• Submitted video interviews</li> <li>• Photos for badges</li> </ul>
H. Professional or employment-related information	<ul style="list-style-type: none"> <li>• Employer information – including name, job title, employment dates, reason for leaving, description of duties, address, contact name, and phone number</li> <li>• Prior employer information</li> <li>• Information provided by you as part of the application – including a resume, references, certificates, and licenses</li> <li>• Salary Expectation</li> <li>• Education – including major, degrees obtained, and GPA</li> <li>• Schools attended – including address, phone number, and dates attended</li> <li>• Employment restrictions – including non-compete, non-solicitation, immigration status, or confidentiality</li> <li>• Complaints received</li> <li>• Named party in litigation, arbitration, or civil actions</li> <li>• Court Orders</li> <li>• Federal or state regulatory agency violations</li> <li>• Disciplinary action by professional organization</li> <li>• Named party in an unsatisfied judgments or liens</li> <li>• Bond company denials, revocations, or pay outs</li> </ul>
I. Inferences drawn from other personal information	<ul style="list-style-type: none"> <li>• Tobacco usage (if applicable)</li> <li>• Outside business activities – if a Registered Representative</li> </ul>

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you apply for a position with the Company, we will use that information to assist in hiring decisions to the extent permissible under applicable law.

- To carry out our obligations and enforce our rights arising from any employment relationship between you and us.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

The Company will not collect additional categories of personal information or use the personal information we collected for additional purposes without providing you notice.

***Non-Customer Visitors to Nationallife.com***

The Company does not collect any personal information from non-customer visitors to nationallife.com with the exception of the following information to the extent voluntarily provided by a site visitor:

Category	Specifics
Identifiers – including personal information under California’s Customer Records law (Cal. Civ. Code 1798.80(e))	<ul style="list-style-type: none"> <li>• Name (first and last)</li> <li>• Address</li> <li>• Phone number</li> <li>• Email address</li> <li>• Comments – i.e., “How may we help you?”</li> </ul>

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information asking a financial professional to contact you, we will use that information in order to fulfill your request.
- To provide you with information, productions, or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including billing, notifications, and claims.
- To improve our website and present its contents to you.
- For testing, research, analysis, and product development.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
- To respond to law enforcement requests and required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

## **Sharing Personal Information**

We may disclose your personal information to third parties for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates
- Service providers
- Agents that sell our products
- Third parties to whom you, or your agents, authorize us to disclose your personal information in connection with products or services we provide to you
- Regulatory or legal bodies, including adult protective services and law enforcement agencies

## **Your Rights**

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Right to Request Customer Specific Disclosure***

Except to the extent the CCPA otherwise provides, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you the following information to the extent required by the CCPA:

- The categories of personal information we have collected about you.
- The categories of sources from which your personal information was collected.
- The business purpose for collecting information.
- The categories of third parties with whom the business shares personal information.
- The specific pieces of personal information collected on you.
- The categories of your personal information that were disclosed for business purposes in the 12 months preceding your request.

### ***Right to Request Deletion***

Except to the extent the CCPA otherwise provides, you have the right to request that we delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete, if applicable) your personal information from our records to the extent required by the CCPA.

We may deny your deletion request if retaining the information is necessary for us or our service providers, if applicable, to:

1. Complete the transaction for which we collected the personal information, provide a good or service requested by you or, reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code, to the extent such compliance is required.
6. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Otherwise use your personal information internally and in a lawful manner that is compatible with the context in which you provided the information.

### ***Contact Information for Exercising Your Rights***

To exercise your right to request customer specific disclosure or the right to request deletion as described above, please submit a verifiable consumer request to us by either:

- Emailing us at: [NLGCompliance@nationallife.com](mailto:NLGCompliance@nationallife.com)
- Calling us at: 800-732-8939; or

This information will be disclosed and delivered to you free of charge within 45 days by mail or electronically, as chosen by you. This information is limited to the information collected in the last 12 months, as of the date of your request, and may be provided at any time, not to exceed more than twice in a 12-month period.

### **Non-Discrimination**

The Company will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Deny your appointment with the Company.
- Deny you employment with the Company.
- Charge you different prices or rates for goods or services, including through the use of discounts or other benefits.
- Impose penalties on you.
- Provide you a different level of quality of goods or services to you.
- Suggest that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

However, we may charge you a different price or rate, or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to us by your data.

### **Changes to Our Privacy Notice**

The Company reserves the right to amend this notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by mail or through a notice on our website homepage.

### **Contact Information**

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 800-732-8939

Email: [NLGCompliance@nationallife.com](mailto:NLGCompliance@nationallife.com)

Postal Address: National Life Group  
Attn: Michele Dungworth, Mail Stop M530  
One National Life Drive  
Montpelier, VT 05604