

California-Specific Privacy Policy (“Policy”)

California consumers have certain privacy rights granted under the California Consumer Privacy Act. This Policy sets out those rights and provides individuals a form to submit Privacy Data Requests to Jackson[®]. Jackson[®] reserves the right to modify this Policy at any time and will post the current Policy incorporating those changes on this page. Changes to this Policy are effective as of the date they are posted. This Policy was last updated on September 1, 2021.

1. Managing Your Privacy Rights.

Below is a list of privacy rights regarding your personal information under California law.

Right to Know About Personal Information Collected Disclosed or Sold
You have the right to request Jackson [®] disclose what personal information it collects, uses, discloses, and sells.
Right to Request Deletion of Personal Information
You have the right to request deletion of personal information collected or maintained by Jackson [®] .
Right to Opt-Out of the Sale of Personal Information
Jackson [®] does not sell your personal information, including the personal information of minors under 16 years of age without affirmative authorization.
Right to Non-Discrimination for the Exercise of Your Privacy Rights
You have the right not to receive discriminatory treatment by Jackson [®] for exercising your privacy rights under the California Consumer Privacy Act. We will not discriminate against you if you choose to exercise any of your rights under California law.
Instructions for Submitting a Verifiable Consumer Request
To exercise any of the above rights you or your authorized agent can submit a request using the Privacy Data Request form or by calling Jackson [®] Customer Service at 800-644-4565. Upon submission of your request we will take commercially reasonable steps to verify your identity and, if applicable, your authorized agent before granting access to or making any changes to your personal information. You will be required to verify your identity by providing your first name, last name, and email address. In some instances, we may ask you to

provide other information such as your mailing address or the last four digits of your Social Security Number to verify your identity. If this happens, we will reach out to you directly with this request.

As explained in our [Web Privacy Policy](#), online visitors may request changes to, or opt-out of collection of certain personal information at any time. Additionally, any individual who receives email marketing material from Jackson[®] may opt-out of further electronic communication by following the opt-out instructions contained in the email message.

We will make good faith efforts to provide you with access to your data when you request it, but there may be circumstances in which we need not provide access as allowed by law, including but not limited to instances where the information contains legal privilege, where your identity could not be verified, or where the information may compromise yours or others’ privacy or other legitimate rights. If we determine that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

2. Categories of Personal Information Collected Within the Past 12 Months.

Below is a list of the categories of personal information we have collected within the past 12 months. We did not necessarily collect all the specific pieces of personal information listed for any given person. Please note that these are *categories* of personal information as they are set forth under California law.

Personal Information Category
(A) Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
(B) Any categories of personal information described in subdivision (e) of Section 1798.80: (e) “Personal information” means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, or any other financial information, medical information, or health insurance information. “Personal information” does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

(C) Characteristics of protected classifications under California or federal law:

Sexual orientation	Gender identity and gender expression
Race	Color
National origin	Religion
Medical conditions	Sex (including pregnancy, childbirth, and related medical conditions)
Disability: physical or mental	Age (40 or older)
Genetic information	Marital Status
Military or Veteran status	Political affiliations or activities
Status as a victim of domestic violence, assault, or stalking	

(D) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

(E) Biometric information.

(F) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.

(G) Geolocation data.

(H) Audio, electronic, visual, thermal, olfactory, or similar information.

(I) Professional or employment-related information.

(J) Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

(K) Inferences drawn from any of the information identified in this chart to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

3. Business Purpose for Which the Personal Information Was Collected Within the Past 12 Months.

Below is a list of the business purposes for collection of personal information. We did not necessarily collect all the specific pieces of personal information listed above for any given business purpose.

Business Purpose for Which the Personal Information Was Collected
(1) Auditing related to a current interaction with the consumer and concurrent transactions.
(2) Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
(3) Debugging to identify and repair errors that impair existing intended functionality.
(4) Short-term, transient use.
(5) Performing services internally on behalf of Jackson [®] or for service providers, including, but not limited to, maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying personal information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of Jackson [®] or service providers.
(6) Undertaking internal research for technological development and demonstration.
(7) Undertaking activities to verify or maintain the quality or safety of a service, information system or device that is owned, manufactured, manufactured for, or controlled by Jackson [®] , and to improve, upgrade, or enhance the service, information system or device that is owned, manufactured, manufactured for, or controlled by Jackson [®] .
(8) Employment-related purposes, including but not limited to, hiring, talent evaluation, investigations, benefits, compensation, performance evaluation, and termination.

4. Categories of Sources from Which Personal Information is Collected

The categories of sources of the personal information collected is from you (through forms, correspondence, telephone, and your use of Jackson[®] websites), from your employer, consumer reports, and data aggregators.

5. Categories of Third Parties with Whom Jackson Shares Personal Information.

Jackson does not share or sell your personal information with "third-parties" as defined by California law.

6. Exercise Your Rights

If you have any questions about this Policy or about exercising your rights described above, you can submit a Privacy Data Request by [using this form](#) or by contacting us at 800-644-4565.