



## **Jackson's Associate Privacy Notice**

Effective Date: October 23, 2020

Privacy of personal information is a top priority at Jackson National Life Insurance Company, Jackson National Life Distributors, LLC, Jackson National Asset Management, PPM America, Inc. and PGDS US One LLC ("Jackson", "we" or "us").

This Associate Privacy Notice ("Notice") is intended to provide associates with notice that identifies the categories of personal information that may be collected and why Jackson collects such information.

### **Updates**

This Notice will be updated at least once every twelve (12) months to reflect changes in our business, legal or regulatory obligations. The current version will be posted for applicants and internal associates can periodically check this Notice periodically for changes by visiting the Corporate Policies page on Jackson's intranet site. Jackson will not collect additional categories of your personal information or use your personal information already collected for additional purposes without providing you with a notice of our intent to do so. Any changes to this Notice will be effective from the date they are communicated to you. If we make any material changes to this Notice, we will notify you before such changes are effective.

### **Definitions**

*"Personal information"* includes information that is collected by Jackson about you in the course of employment for employment related purposes and includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you.

*"Process", "processed" or "processing"* means any operation or set of operations which is performed on personal information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal information.

*"Associates", "associate" or "you"* means an identified or identifiable natural person who is acting as a Jackson job applicant, associate, or contractor. In this context *"job applicant"* refers to any person who has submitted his or her candidacy with Jackson; *"associate"* refers to any person who is employed at Jackson as a full-or part-time associate, strategic support associate, temporary worker, or intern and *"contractor"* means a natural person who provides any service to Jackson pursuant to a written contract.

### **Personal Information We Collect About You**

Listed below are the categories of personal information that Jackson may process about associates:

Identifiers, including real name, alias, postal address, unique personal identifiers, email, account name, social security number, driver's license number, passport number or other similar identifiers. In this context, a "unique personal identifier" means a persistent identifier that can be used to recognize an associate, or a device that is linked to an associate, over time and across different services, including, but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, or similar technology; unique pseudonym, or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers.

Characteristics of Protected Classifications Under California or Federal Law, including the following: race, ethnicity, national origin, religion (includes religious dress and grooming practices), sex/gender (includes pregnancy, childbirth, breastfeeding and/ or related medical conditions), gender identity, gender expression, sexual orientation, marital status, medical condition (such as genetic characteristics, cancer or a record or history of cancer), disability (such as mental and physical including HIV/AIDS, or cancer), military or veteran status, request for family care leave, request for leave for an associate's own serious health condition, request for pregnancy disability leave, and age.

Internet or Other Electronic Network Activity Information, including business emails, text messages, browsing history, search history, application access location and information regarding an associate's interaction with an internet website, application or advertisement, time and geolocation data related to use of an internet website, application or physical access to a Jackson office location.

Professional or Employment-related Information, including job related data, maintained as part of an application or the employment relationship that is present in: a job application or resume; an employment contract or job offer; a contractor agreement; a performance review; a disciplinary record; an investigation; photos; biometric data, including imagery of your fingerprint, face, and voice recordings; information from associate expenses; browsing and search history; payroll and benefits related data; internal and external contact information; or information captured from video, audio, systems, or other forms of monitoring or surveillance.

Education Information, including information about an associate's educational background, such as education records and transcripts, that is not publicly available.

Inferences, including any information drawn from any of the personal information categories referenced above to create a profile about an associate reflecting the associate's characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

### **Purposes for Collecting Your Personal Information**

Jackson may collect the personal information identified above for the business reasons listed below.

To Recruit Associates, including to conduct employment related background screening and checks, criminal background checks and drug testing.

To Administer Benefits, such as medical, dental, vision, and retirement benefits, including recording and processing eligibility of dependents, tuition reimbursement, absence and leave monitoring, and life insurance.

To Pay and Reimburse for Expenses, including salary administration, payroll management, payment of expenses, to administer other compensation related payments, including assigning amounts of bonus payments to individuals and administration of departmental bonus pools.

To Conduct Performance-Related Reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring.

To Monitor Work-Related Licenses and Credentials, including provisioning licenses for use in the course of an associate's work-related responsibilities, ensuring compliance, training, examination and other requirements are met with applicable regulatory agencies.

To Provide Our Associates with Human Resources Management Services, including providing associate data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of associate claims, and travel administration.

To Administer Domestic and International Travel/Assignments, including relocation services, documenting assignment terms and conditions, obtaining relevant immigration documents, initiating vendor services, fulfilling home/host country tax administration and filing obligations and addressing health and safety requirements.

To Maintain Your Contact Information, including altering your details across relevant entities within Jackson (for example personal, other employment and transferring roles).

To Assist You in Case of Emergency, including maintenance of contact details for you, and your dependents in case of personal or business emergency.

To Monitor Eligibility to Work in the U.S., which means monitoring and ensuring compliance of associates' ability to work in the U.S.

To Conduct Healthcare-Related Services, including conducting pre-employment and employment-related medical screenings for return to work processes and medical case management needs; determining medical suitability for work-related tasks; identifying health needs of associates to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on fitness for travel and fitness for expatriation.

To Facilitate Better Working Environment, which includes conducting associate surveys, providing senior management information about other associates, and conducting training.

To Ensure a Safe and Efficient Working Environment, which includes processing relating to disciplinary actions, associate handbook and code of conduct processes and investigations.



*To Maintain Security on Jackson's Information Systems, Websites and Internet Connected Assets*, which includes hosting and maintenance of computer systems and infrastructure; management of Jackson's software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and Internet access.

*To Comply with Applicable Law or Regulatory Requirements*, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic and health, safety, security and environmental reporting.

### **Further Information**

If you have any questions about this statement, please contact Group wide Information Security and Privacy: [JacksonPrivacyOffice@jackson.com](mailto:JacksonPrivacyOffice@jackson.com). For Jackson's other privacy policies, or to submit a request related to your privacy rights, please visit Jackson's [Legal and Privacy page](#).