



Jackson Financial Inc. Associate Privacy Notice

Effective Date: October 1, 2025

Privacy of associate personal data is a top priority at Jackson Financial Inc. (together with its subsidiaries, the "Company", "we", "our").

This Associate Privacy Notice ("Notice") is intended to provide associates with notice that identifies the categories of personal data that may be collected and why the Company collects, uses, or shares 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 for changes by visiting the Corporate Policies page on the Company's intranet site. The Company will not collect additional categories of your personal data or use your personal data 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

"Associates", "associate" or "you" means an identified or identifiable natural person who is acting as a job applicant, associate, or contractor. In this context *"job applicant"* refers to any person who has submitted their candidacy with the Company; *"associate"* refers to any person who is employed at the Company 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 the Company pursuant to a written contract.

"Personal data" includes information that is collected by the Company 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 data, 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 data.

Sensitive personal information, any component of personal data alone or in conjunction with any other information, the compromise of which could create a reasonable likely risk of substantial harm or inconvenience to an individual identified with the information. Example include: a data subject's Social Security number, driver's license number, state identification card, alien registration number, employer or tax ID number, or passport number, account log-in financial account, debit or credit card number in



combination with any required security or access code, password or credentials allowing access to an account, precise geolocation, racial and ethnic origin, religious or philosophical beliefs, or union membership, contents of personal communications (mail, email and text messages – unless the business is the intended recipient), genetic data, biometric data used to identify an individual, a unique electronic ID number, address, or routing code, telecommunication identifying information or access device, health information, and information about one's sex life or sexual orientation.

Personal Data We Collect About You

Listed below are the categories of personal data that the Company may have collected or used within the past 12 months. We did not necessarily collect all the specific pieces of personal data listed for any given associate or category.

Identifiers, including real name, alias, postal address, unique personal identifiers, online identifier, Internet Protocol address, email address, 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: sexual orientation, 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, age and political affiliations or activities. We do not use or disclose sensitive personal information for purposes other than as specified in section 7027(m) of the California Consumer Privacy Act ("CCPA").

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

Internet or Other Electronic Network Activity Information, including, but not limited to, 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, software application, or physical access to any of the Company's office locations.

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; professional networking sites; 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, voice print and voice recordings; information from associate expenses; internet 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 data 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 Data

The Company may collect the personal data identified above for the business reasons listed below. Use of your personal data depends on your relationship to the Company. We do not necessarily collect all the specific pieces of personal information listed about for any one specific business purpose, but rather, we used personal data, generally, in the below circumstances. Except as indicated below, the Company retains personal information pursuant to its document retention policy which is in accordance with our governing laws and regulations.

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 during 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 the Company (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 the Company's Information Systems, Websites and Internet Connected Assets, which includes hosting and maintenance of computer systems and infrastructure; management of the Company'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.

5. Changes to Notice

This notice explains broadly how we collect, share and use associate personal data. You may be provided with privacy policies or statements that supplement this notice. The Company reserves the right to change its privacy policy or any supporting or related policies or procedures at any time. If there are any changes to this notice, documents containing the revisions will be updated, including at our website at Legal and Privacy page on www.jackson.com, and will be effective immediately.

6. Further Information

If you have any questions about this statement, please contact: JacksonPrivacyTeam@jackson.com. For the Company's other privacy policies, please visit our [Legal and Privacy](#) page on www.jackson.com. If you would like to act upon your rights regarding your personal information, please access our [Privacy Data Request form](#) located on Jackson.com. You can also contact Jackson by phone at 1 (800) 644-4565 or by mail at 1 Corporate Way, Lansing, MI 48951. As a job applicant, associate, or contractor you have the right not to receive discriminatory treatment and not to be retaliated against for exercising your CCPA rights.

