LifeGuard Freedom® Suite of Living Benefits Guide

Guarantees are backed by the claims-paying ability of Jackson National Life Insurance Company of New York® and do not apply to the principal amount or investment performance of a variable annuity’s separate account or its underlying investments.

Perspective II®
Guaranteeing Lifetime Income

Add-on living benefit availability and certain terms may vary by firm.
This material is authorized for use only when preceded or accompanied by the current prospectus.
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Not FDIC/NCUA insured • May lose value • Not bank/CU guaranteed
Not a deposit • Not insured by any federal agency
What are variable annuities?
Variable annuities are long-term, tax-deferred investments designed for retirement, involve investment risks, and may lose value. Earnings are taxable as ordinary income when distributed and may be subject to a 10% additional tax if withdrawn before age 59½.
Add-on living benefits are available for an extra charge in addition to the ongoing fees and expenses of the variable annuity.
YOUR LIFE. YOUR RETIREMENT. YOUR WAY.

No pension? Create a personal plan for today, tomorrow, and what’s next.

You’ve taken the first step toward financial freedom by partnering with a financial advisor. Now’s a great time to learn a little bit more about the choices in front of you.

Protected Income For Life℠*
Longer lifespans are leading to more years in retirement. That means even more time to enjoy passions and to be with loved ones. A steady stream of lifelong income in retirement can help you pursue what matters most, and a variable annuity with the purchase of an add-on benefit can provide that.

Lifetime Check℠
Imagine your income in retirement can be protected from market downturns, while still capturing the opportunity for growth.† Now imagine that retirement income lasting your entire life—no matter how long you live.

When you purchase a variable annuity with add-on living benefits, you can potentially receive a Lifetime Check that’s unaffected by interest rate fluctuations and market downturns. Your check comes monthly, quarterly or yearly, so you can have income for the rest of your life—and your Lifetime Check even has the potential to keep growing.

Funding Your Longevity
A person retiring at age 60 could run out of money too soon because savings and investments (excluding pensions) may not last throughout their lifetime.

Average Years in Retirement

Content on this chart is based on Jackson of NY® calculations of information from: Social Security Administration, Life Expectancy Calculator, as of March 19, 2019.

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Add-on living benefits are available for an additional cost. Availability and certain terms may vary by firm.

† The guaranteed minimum withdrawal benefits (GMWBs) discussed in this brochure are available for an extra charge in addition to the ongoing fees and expenses of the variable annuity. Only one add-on living benefit and one add-on death benefit may be elected per contract. Once elected, benefits may not be canceled; please see prospectus for specific benefit availability. The long-term advantage of the add-on benefits will vary with the terms of the benefit option, the investment performance of the Variable Investment Options selected and the length of time the annuity is owned. As a result, in some circumstances, the cost of an add-on benefit may exceed the actual benefit paid under the option.

The latest income date allowed is age 95, which is the required age to annuitize or take a lump sum. Please see the prospectus for important information regarding the annuitization of a contract.

This material was prepared to support the promotion and marketing of Jackson of NY variable annuities. Jackson of NY, its distributors and their respective representatives do not provide tax, accounting or legal advice. Any tax statements contained herein were not intended or written to be used, and cannot be used, for the purpose of avoiding U.S. federal, state or local tax penalties. Please consult your own independent advisors as to any tax, accounting or legal statements made herein.
PROTECTION AND GROWTH FOR THE LIFE YOU WANT

In addition to income for life, Jackson of NY helps ensure growth by providing you with benefits you can count on in any market.

Maximizing Your Lifetime Income

Building the money you’ll live on in retirement starts with growing your “protected balance” (see right). To generate the largest amount of income, you’ll want to grow your balance as much as possible.

Capture Market Growth

First, if your investment options perform well, **step-ups** automatically lock in gains and grow your protected balance on each contract anniversary. Choose from the following options:

- **Annual step-ups** lock in your contract anniversary value.
- Once a year, **quarterly step-ups** look back at your contract value (on each quarterly contract anniversary) and lock in the highest value* of the four quarters.

Growth During Market Downturns

But if the markets flatten or even fall, your protected balance can still grow. How? Jackson of NY will increase it by a certain percentage. This is called your “**bonus.**”  

- Applied in years you don’t take a withdrawal during the bonus period.
- The bonus period lasts for at least the first 10 contract years but can reset with a step-up, potentially allowing you to receive bonuses through age 90.

The Power of Two

So what happens when your protected balance steps up due to market growth? The amount of your future bonuses will step up too. Why? Because those bonuses will now be determined by your larger value following a step-up.

The above hypothetical examples are for illustrative purposes only and are not representative of the future performance of any particular product. Past performance is no guarantee of future results. Step-ups and the annual bonus are applied on an annual basis, if applicable, to your protected balance, not the contract value, and you receive the greater of the two, not both.

*Adjusted for subsequent premiums and withdrawals.

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Growth In Any Market
Climb, fall, or stall—no matter what markets are doing, Jackson of NY has mechanisms in place to support ongoing protection and growth.

The Power of Investment Freedom
Jackson of NY provides flexibility with more than 140 investment options*—without forcing you into predetermined models—so you and your advisor can create the portfolio that’s right for you.

Your 200% Adjustment
If, after 12 years or age 70† (whichever is later), you have not taken any withdrawals and your protected balance has not grown to at least 200% of your first-year premiums through step-ups and bonuses, we’ll increase the amount by 200%.‡ This feature, available on all benefits discussed in this brochure, builds in yet another way for your future income base to grow.

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*Select up to a maximum of 99 investments and adjust options or allocations up to 25 times each contract year without transfer fees. To prevent abusive trading practices, Jackson of NY restricts the frequency of transfers among Variable Investment Options, including trading out of and back into the same subaccount within a 15-day period.

†For LifeGuard Freedom Flex® with Joint Option and LifeGuard Freedom Net℠ with Joint Option, the age for the 200% adjustment is 71.

‡Any withdrawals, including RMDs, may void the 200% GWB adjustment. For qualified contract owners, please consider whether the timing of your RMD at age 70½ will void the 200% GWB adjustment.

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Withdrawals before age 59½ may be subject to a 10% additional tax. Withdrawals may be subject to withdrawal charges and market value adjustments where applicable.
CUSTOMIZE YOUR INCOME TO FIT THE LIFE YOU WANT

Your living benefit is based on the Income Stream® you select.

Plan for Your Priorities

In addition to your bonuses and step-ups, there’s another feature that comes with your living benefit from Jackson of NY: Your Income Stream. The Income Stream you choose will determine what percentage of your protected balance you’ll receive each year. Income can begin anytime after election—and will continue for the rest of your life.1

- The percentage you receive is based on your age at the time of your first withdrawal and may even increase as you age.
- Your lifetime income won’t decrease unless you take excess withdrawals.6
- You can begin enjoying your lifetime income any time after age 59½.1

A Closer Look

Income Streams: As the name implies, our Income Streams offer you a “stream of income” you can’t outlive.1 Specifically, they provide you with a percent of your protected balance determined at your first withdrawal that can increase with market step-ups. You’ll receive this amount each year for the rest of your life.

You’re in This Together.

If protecting yourself and your spouse in life is important to you, you may want to consider a joint option that provides guaranteed lifetime income for both of you.7

Which Income Stream is Right for You?

The flexibility of our Income Streams allow you to find the appropriate mix of cost and income. Will you need to take income immediately? Or can you wait until a later date, giving you potential to grow your future income? All of this should be considered when choosing an Income Stream.

<table>
<thead>
<tr>
<th>Income Stream Options</th>
<th>MAX</th>
<th>VALUE</th>
</tr>
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<tbody>
<tr>
<td>Receive the most</td>
<td></td>
<td>Complement the savings you’ve already built.</td>
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<tr>
<td>guaranteed income.</td>
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</table>

You’ll consult with your advisor to decide which Income Stream best fits your needs, and then combine it with the benefit that aligns to your plan.

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1 Once elected, the bonus and income options you choose cannot be changed or terminated.
YOUR PRIORITIES. YOUR BENEFIT.

Now that we’ve reviewed the features that come with our suite of living benefits, it’s time to choose an add-on living benefit that fits you.

With Jackson of NY, you can tailor your annuity to support your specific goals. Once you decide what’s most important to you, you’ll be ready to select an add-on living benefit.

A Closer Look

Add-on Living Benefits: These strategies allow you to focus on your personal goals, knowing that you’ll receive guaranteed income for life.¹

| Customize your growth | LifeGuard Freedom Flex® and LifeGuard Freedom Flex with Joint Option⁷
<table>
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<tbody>
<tr>
<td></td>
<td>Choose a customizable annual bonus² of 5%, 6%, or 7% to help grow future income*</td>
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</tbody>
</table>

| Prioritize boosting your income | LifeGuard Freedom Net® and LifeGuard Freedom Net with Joint Option⁷
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<tbody>
<tr>
<td></td>
<td>Give an extra boost to income when you have earnings⁸ in your contract through an earnings-sensitive adjustment⁹</td>
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</table>

| Balance taking income with leaving a legacy | LifeGuard Freedom Flex® DB NY
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<tbody>
<tr>
<td></td>
<td>Complement your lifetime income with an enhanced death benefit to help you leave a legacy for loved ones or other beneficiaries¹⁰</td>
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</table>

Let’s Dive Deeper

Consult with your advisor and use the following sections to compare these options and determine which works best for you.

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Withdrawals before age 59½ may be subject to a 10% additional tax. Withdrawals may be subject to withdrawal charges and market value adjustments where applicable.
LIFEGUARD FREEDOM FLEX

Customize your growth by pairing your choice of a bonus with annual step-ups and the Income Stream that fits your needs.

FOCUS ON  Growing Your Income

This benefit offers a unique level of flexibility by allowing you to choose from three bonus options: 5%, 6%, or 7%.* Select your ideal amount to help increase your guaranteed withdrawal balance, the “protected balance” from which you take income. In order to help you choose which bonus amount is right for you, you may wish to consider the following:

- The importance of cost vs. guaranteed growth. A higher bonus may yield more growth, but it will also cost more. Is cost a concern or are you willing to pay a higher annual charge in order to receive a higher bonus?

- Income sooner vs. income later. Do you need to take income right away or do you have time to grow your future income? Considering the length of time you have to grow your future income—and the period of time bonuses have to accrue—can help in your decision of which bonus to choose.

Choose between annual or quarterly step-ups† that can help provide even more income when investments perform well.

Taking Your Income

Once you’ve chosen your bonus amount, you’ll want to select the Income Stream that best fits your priorities. Income Streams provide flexibility and cost-conscious options that allow you to determine the specific income range that aligns with your plans.

Choose a single life or joint life option‡ to provide lifetime income for just you or you and your spouse.‡

Choosing What You’ll Receive

As you’re preparing for your future, how much money will you need? Use your answer as a guide, and select an option to fuel your priorities.

<table>
<thead>
<tr>
<th>Income Stream Guaranteed Annual Withdrawal Amount (GAWA)*</th>
<th>Income Stream GAWA for LifeGuard Freedom Flex 7%‡</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Age Range</strong></td>
<td><strong>MAX (Single)</strong></td>
</tr>
<tr>
<td>35-64</td>
<td>4.00%</td>
</tr>
<tr>
<td>65-74</td>
<td>5.00%</td>
</tr>
<tr>
<td>75-80</td>
<td>5.50%</td>
</tr>
<tr>
<td>81+</td>
<td>6.00%</td>
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<td></td>
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</tr>
</tbody>
</table>

LifeGuard Freedom Flex is a Required Minimum Distribution (RMD) friendly benefit, so qualified contracts are not subject to the stated maximum.

Available ages 35-80 at election.

*Once elected, the bonus and income options you choose cannot be changed or terminated.
†Quarterly step-ups look back at your contract value on each quarterly contract anniversary and once a year automatically lock in the highest value, adjusted for subsequent premiums and withdrawals.
‡LifeGuard Freedom Flex with Joint Option 7% is not available in New York.

Guarantees are backed by the claims-paying ability of Jackson National Life Insurance Company of New York and do not apply to the principal amount or investment performance of a variable annuity’s separate account or its underlying investments.

Withdrawals before age 59½ may be subject to a 10% additional tax. Withdrawals may be subject to withdrawal charges and market value adjustments where applicable.
**Putting it Together**

Want to learn more? Let’s take a closer look at how LifeGuard Freedom Flex works.

This hypothetical example is for illustrative purposes only and is not representative of the future performance of any particular product. Past performance is no guarantee of future results. Step-ups and the annual bonus are applied on an annual basis, if applicable, to your protected balance, not the contract value, and you receive the greater of the two, not both. It’s important to keep in mind the difference between your contract value and protected balance, which this example illustrates. While your contract value will fluctuate based on the investments you select, your protected balance will not decline as a result of investment performance; however, it is not a cash value, not available as a lump sum, and decreases on a dollar-for-dollar basis as you withdraw your guaranteed annual withdrawal amount (GAWA) or required minimum distribution (RMD).

**Cost Considerations**

Below, you’ll find the charges associated with this benefit and the Income Stream you prefer.

<table>
<thead>
<tr>
<th>Benefit and Income Stream Charges</th>
<th>MAX (Single and Joint)</th>
<th>VALUE (Single and Joint)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LifeGuard Freedom Flex 5% Bonus and Annual Step-Ups</td>
<td>1.23% / 1.32%</td>
<td>0.57% / 0.87%</td>
</tr>
<tr>
<td>LifeGuard Freedom Flex 6% Bonus and Annual Step-Ups</td>
<td>1.32% / 1.44%</td>
<td>0.69% / 0.99%</td>
</tr>
<tr>
<td>LifeGuard Freedom Flex 7% Bonus and Annual Step-Ups</td>
<td>1.47% / N/A</td>
<td>0.84% / N/A</td>
</tr>
<tr>
<td>LifeGuard Freedom Flex 5% Bonus and Quarterly Step-Ups</td>
<td>1.32% / 1.41%</td>
<td>0.66% / 0.96%</td>
</tr>
<tr>
<td>LifeGuard Freedom Flex 6% Bonus and Quarterly Step-Ups</td>
<td>1.41% / 1.53%</td>
<td>0.78% / 1.08%</td>
</tr>
<tr>
<td>LifeGuard Freedom Flex 7% Bonus and Quarterly Step-Ups</td>
<td>1.56% / N/A</td>
<td>0.93% / N/A</td>
</tr>
</tbody>
</table>
Growing Your Income
As with other add-on benefits, you’ll use a bonus and step-ups to help increase your guaranteed withdrawal balance, the “protected balance” from which you take income. This benefit includes the annual bonus amount of 6%.

Choose between annual or quarterly step-ups that can help provide even more income when investments perform well.

FOCUS ON Taking Your Income
LifeGuard Freedom Net provides a feature that allows you to have guaranteed income for life plus greater access to your earnings. Our two distinct Income Streams provide more flexibility—plus cost-conscious options—so you can plan for your unique income needs.

- **Choose a single life or joint life option** to provide lifetime income for just you or you and your spouse.
- **A guaranteed floor of income**, called the guaranteed annual withdrawal amount (GAWA), is based on your age at the time of your first withdrawal.
- **The earnings-sensitive adjustment (ESA)** allows you to take more income when you have guaranteed minimum withdrawal benefit (GMWB) earnings.

Choosing What You’ll Receive
As you’re preparing for your future, how much money will you need? Use your answer as a guide, and select an option to fuel your priorities.

### Range of Income Stream Withdrawal Amounts

<table>
<thead>
<tr>
<th>Age Range</th>
<th>MAX (Single)</th>
<th>MAX (Joint)</th>
<th>VALUE (Single and Joint)</th>
</tr>
</thead>
<tbody>
<tr>
<td>35-64</td>
<td>4.00% up to 6.67%</td>
<td>3.50% up to 5.83%</td>
<td>3.00% up to 5.00%</td>
</tr>
<tr>
<td>65-74</td>
<td>5.00% up to 8.33%</td>
<td>4.50% up to 7.50%</td>
<td>4.00% up to 6.67%</td>
</tr>
<tr>
<td>75-80</td>
<td>5.50% up to 9.17%</td>
<td>5.00% up to 8.33%</td>
<td>4.50% up to 7.50%</td>
</tr>
<tr>
<td>81+</td>
<td>6.00% up to 10.00%</td>
<td>5.50% up to 9.17%</td>
<td>5.00% up to 8.33%</td>
</tr>
</tbody>
</table>

LifeGuard Freedom Net is a Required Minimum Distribution (RMD) friendly benefit, so qualified contracts are not subject to the stated maximum.

### Available ages
35-80 at election.

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*Quarterly step-ups look back at your contract value on each quarterly contract anniversary and once a year automatically lock in the highest value, adjusted for subsequent premiums and withdrawals.

† Once elected, the bonus and income options you choose cannot be changed or terminated.

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Withdrawals before age 59½ may be subject to a 10% additional tax. Withdrawals may be subject to withdrawal charges and market value adjustments where applicable.
Putting it Together
The guaranteed annual withdrawal amount (the “floor”) and the earnings-sensitive adjustment (ESA) are added together to calculate your total annual withdrawal:

1. Floor.
Based on a protected balance of $100,000, the client receives 5% annual withdrawals every year for life.

2. ESA.
Because of the $2,000 in earnings, the earnings-sensitive adjustment allows the client to withdraw additional income.

3. Total withdrawal.
Even though the protected balance did not grow, the client still receives a greater total annual withdrawal.

Important Assumptions: Let’s examine a hypothetical example in which a client receiving 5% guaranteed income per year invests $100,000 and takes a withdrawal on the second day of the contract, at which point the value has grown to $102,000.

Cost Considerations
Below, you’ll find the charges associated with this benefit and the Income Stream you prefer.

<table>
<thead>
<tr>
<th>Benefit and Income Stream Charges</th>
<th>MAX (Single and Joint)</th>
<th>VALUE (Single and Joint)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LifeGuard Freedom Net and Annual Step-Ups</td>
<td>1.47% / 1.59%</td>
<td>0.84% / 1.14%</td>
</tr>
<tr>
<td>LifeGuard Freedom Net and Quarterly Step-Ups</td>
<td>1.56% / 1.68%</td>
<td>0.93% / 1.23%</td>
</tr>
</tbody>
</table>

*LifeGuard Freedom Net is a Required Minimum Distribution (RMD) friendly benefit, so qualified contracts are not subject to the stated maximum. Withdrawals before age 59½ may be subject to a 10% additional tax. Withdrawals may be subject to withdrawal charges and market value adjustments where applicable.
**LIFEGUARD FREEDOM FLEX DB NY**

Balance taking income with leaving a legacy when both are a priority.

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**Growing Your Income**

As with other add-on benefits, you’ll use a bonus and step-ups to help increase your guaranteed withdrawal balance, the “protected balance” from which you take income. This benefit includes the annual bonus amount of 6%.

**Choose between annual or quarterly step-ups** that can help provide even more income when investments perform well.

**Taking Your Income**

Select the Income Stream that best fits your expected needs. Income Streams provide flexibility and cost-conscious options that allow you to determine the specific income range that aligns with your plans.

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**FOCUS ON  ** Leaving a Legacy

LifeGuard Freedom Flex DB NY has an **enhanced death benefit** that helps you pass on a greater legacy to your beneficiaries.

- **Protect a death benefit** equal to the sum of your premium payments that is reduced dollar-for-dollar for your allowed annual withdrawals. Keep in mind that withdrawals also reduce your contract value.

- **An annual contract anniversary step-up** of the death benefit helps you leave even more for your heirs if your investment options perform well.

- **Lock in a death benefit at annuitization.** Age 95 is the latest you can annuitize, which is when you convert your current account value into income payments. At this time, multiple options will be available, some of which may enable you to lock in the enhanced death benefit.

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**Important Considerations**

Contract fees and poor market performance may also reduce the contract value. If, for any reason, your contract value falls to zero, the enhanced death benefit is terminated and your beneficiaries will not receive a death benefit, however, you may continue to receive guaranteed income. Please consider how taking your guaranteed income will affect the death benefit.

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<table>
<thead>
<tr>
<th>Income Stream Guaranteed Annual Withdrawal Amount (GAWA)</th>
<th>Age</th>
<th>MAX</th>
<th>VALUE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>35-64</strong></td>
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<td><strong>65-74</strong></td>
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<td>5.00%</td>
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<td><strong>75-80</strong></td>
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<td>5.50%</td>
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<td><strong>81+</strong></td>
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<td>6.00%</td>
<td>5.00%</td>
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LifeGuard Freedom Flex DB NY is a Required Minimum Distribution (RMD) friendly benefit, so qualified contracts are not subject to the stated maximum.

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Available ages 35-75 at election.

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*Quarterly step-ups look back at your contract value on each quarterly contract anniversary and once a year automatically lock in the highest value, adjusted for subsequent premiums and withdrawals.

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Putting it Together

Let’s take a closer look at how LifeGuard Freedom Flex DB NY works.

LifeGuard Freedom Flex DB NY provides an enhanced death benefit that is equal to the sum of your premium payments and reduced dollar-for-dollar for your allowed annual withdrawals. It allows you to take guaranteed lifetime income but also to provide for loved ones after you are gone.

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Cost Considerations

Below, you’ll find the charges associated with this benefit and the Income Stream you prefer.

<table>
<thead>
<tr>
<th>Benefit and Income Stream Charges¹¹</th>
<th>MAX</th>
<th>VALUE</th>
</tr>
</thead>
<tbody>
<tr>
<td>LifeGuard Freedom Flex DB NY and Annual Step-ups¹⁰</td>
<td>1.32% + 0.51%</td>
<td>0.69% + 0.30%</td>
</tr>
<tr>
<td>LifeGuard Freedom Flex DB NY and Quarterly Step-Ups</td>
<td>1.41%+ 0.51%</td>
<td>0.78%+ 0.30%</td>
</tr>
</tbody>
</table>

LifeGuard Freedom Flex DB NY is not available with a joint life option.
A COMPANY YOU CAN RELY ON

Where you invest your money matters. And while it’s important to choose investment products that support your individual, long-term strategy, it’s also important to choose a company that can stand behind those products. That’s why you should know that our history is one of uninterrupted service, stability, and financial growth.

| #1 variable annuity company in sales.* | Consistently strong financial ratings.† | Highest customer satisfaction award 13 years in a row.‡ |

A CHECKLIST TOWARDS FINANCIAL FREEDOM.

- **Discuss the uncertainties of retirement**, including how long you’ll live, inflation and market volatility, and how those challenges could affect your unprotected investments.
- **Review your sources of protected income in retirement**, including Social Security and pensions, so you have an idea of how much you can count on to start.
- **Evaluate your monthly expenses for basic needs like mortgage and groceries**. Consider how much of those expenses are covered by protected income sources, and how much you would like to be protected.
- **Think about what would happen if your retirement income were to shrink**, and how you would adapt. Now discuss how a Variable Annuity with a Living Benefit can guarantee that your Lifetime Check by Jackson of NY won’t shrink.
- **Work with your advisor** to understand your income gap and how much of your retirement expenses you should consider covering by investing in a Variable Annuity with a Living Benefit.

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* LIMRA Secure Retirement Institute U.S. Individual Annuities Sales Survey, Year-end 2018, based on total variable annuity sales out of 40 companies that reported sales.

† Ratings current as of 01/02/2019. Financial strength ratings do not apply to the principal amount or investment performance of the separate account or underlying investments of variable products. While ratings can be objective indicators of an insurance company’s financial strength and can provide a relative measure to help select among insurance companies, they are not guarantees of the future financial strength and/or claims-paying ability of a company and do not apply to any underlying Variable Investment Options. The broker/dealer from which an annuity is purchased, the insurance agency from which an annuity is purchased and any affiliates of those entities make no representations regarding the quality of the analysis conducted by the rating agencies. The rating agencies are not affiliated with the above mentioned entities nor were they involved in any rating agency’s analysis of the insurance companies.

This material is authorized for use only when preceded or accompanied by the current contract prospectus and underlying fund prospectuses, which are contained in the same document. Before investing, investors should carefully consider the investment objectives, risks, charges and expenses of the variable annuity and its underlying investment options. This and other important information is contained in the current contract prospectus and underlying fund prospectuses. Please read the prospectuses carefully before investing or sending money.

Guarantees are backed by the claims-paying ability of Jackson National Life Insurance Company of New York and do not apply to the principal amount or investment performance of the variable annuity or any of its subaccounts or underlying investments. They are not based on the broker/dealer from which this annuity contract is purchased, by the insurance agency from which this annuity contract is purchased or any affiliates of those entities, and none makes any representations or guarantees regarding the claims paying ability of Jackson National Life Insurance Company of New York.

Add-on benefits are available for an extra charge in addition to the ongoing fees and expenses of the variable annuity. Only one add-on living benefit and one add-on death benefit may be elected per contract. Once elected, benefits may not be canceled; please see prospectus for specific benefit availability. The long-term advantage of the benefit will vary with the terms of the benefit option, the investment performance of the variable investment option selected and the length of time the annuity is owned. As a result, in some circumstances the cost of the option may exceed the actual benefit paid under the option.

We reserve the right to refuse any subsequent premium payments. At election, the guaranteed withdrawal balance (GWB) is equal to net premium (minus any applicable taxes) subject to a maximum of $10 million.

1. On the contract anniversary or immediately following the designated life’s attained age 59½, the GWB guarantee becomes effective provided: 1) the contract value is greater than zero and 2) the contract has not been annuitized. If the designated life is age 59½ on the effective date of the endorsement, then the for-life guarantee becomes effective on that date. All withdrawals reduce the GWB and, depending on the amount of withdrawals taken, adjusted for any GWB step-ups and any applicable bonus, the GWB may be reset to a lower amount when the for-life guarantee becomes effective.

2. The annual bonus is applied in years no withdrawals are taken during the bonus period. At election, the bonus base is equal to the GWB. At step-up (if the GWB increases upon step-up), the bonus base is increased by the amount of the premium payment. Upon application of the bonus, the GWB will increase by the amount of the premium payment. For qualified contract owners, please contact your tax advisor to determine the impact of the bonus on federal income tax as it may be subject to current Federal tax law.

3. If no withdrawals are taken on or prior to the GWB adjustment date, the owner is eligible for the GWB adjustment. The GWB adjustment date is the later of 1) the 12th contract anniversary following the benefit’s effective date or 2) the contract anniversary on or immediately following the designated life’s 50th birthday. The bonus period ends on the earlier of (a) the 10th contract anniversary following the withdrawal option’s effective date or the most recent bonus base step-up, if later, or (b) the date on which the contract value falls to zero. Each time the bonus is applied, the GWB equals the GWB prior to application of the bonus plus the selected bonus percentage of the bonus base, subject to a maximum of $10 million. The GAWA is recalculated and is equal to the greater of the GAWA percentage multiplied by the new GWB or the GWB prior to the bonus.

4. If no withdrawals are taken on or prior to the GWB adjustment date, the owner is eligible for the GWB adjustment. The GWB adjustment date is the later of 1) the 12th contract anniversary following the benefit’s effective date or 2) the contract anniversary on or immediately following the designated life’s 70th birthday (71st birthday on joint benefits). At election, the GWB adjustment will be 200% of the premium payment subject to a maximum of $10 million. The GWB equal to the GWB adjustment upon step-up or for a bonus. Premium paid after electing any of the LifeGuard Freedom GWBMs but before the first contract anniversary following the effective date of the benefit will increase the GWB adjustment by 200% of the premium payment subject to a maximum of $10 million. Premim paid on or prior to the first contract anniversary following the effective date of the benefit will increase the GWB adjustment by the amount of the premium payment. Upon application of the GWB adjustment, no adjustment will be made to the bonus base. Any withdrawals, including RMDs, may void the 200% GWB adjustment. For qualified contract owners, please consider whether the timing and type of an RMD at age 70½ will void the 200% GWB adjustment...

5. The GAWA percentage is determined at the time of first withdrawal.

6. All withdrawals, including systematic withdrawals, RMDs and free withdrawals, apply to the total amount withdrawn in a contract year. The RMD withdrawal must be for this contract only and the owner must specify that the withdrawal is an RMD.

**Impact of excess withdrawals:** If at the time of withdrawal the sum of all withdrawals taken in the contract year is greater than the GWB or RMD, the GWB/RMD plus earnings-sensitive adjustment (if applicable), the dollar-for-dollar portion is equal to the greater of (a) GAWA or the RMD or the GAWA/RMD plus earnings-sensitive adjustment (if applicable) or (b) zero. The GWB is equal to the greater of (a) the GWB prior to the partial withdrawal less the dollar-for-dollar portion reduced for the excess withdrawal amount in the same proportion as the contract value is reduced or (b) zero. The GAWA is reduced for the excess withdrawal amount in the same proportion as the contract value. Rules may vary upon spousal continuation or if the for-life guarantee is not in effect. Withdrawals under any LifeGuard Freedom GWBM are assumed to be the total amount deducted from the contract value.

Election of §72(1)/72(q) distributions may not be appropriate on contracts with a living benefit. Withdrawals taken under IRC §72(t)/72(q) are not considered required minimum distributions for purposes of preserving the guarantees under the GWBM. 72(t)/72(q) distributions under a GWBM will have the same effect as any withdrawal or excess withdrawal.

7. LifeGuard Freedom Flex with Joint Option and LifeGuard Freedom Net with Joint Option are available on both qualified and nonqualified contracts. For qualified contracts, the annuitant and the sole primary spousal beneficiary, or annuitant and contingent annuitant on qualified custodial contracts, are defined as “covered lives.” and the owner and annuitant must be the same person. For nonqualified contracts, the joint owners are defined as the covered lives. Only a covered life may continue the for-life guarantee upon spousal continuation. The younger covered life is the designated life. At election, both covered lives must be between ages 35 and 80. The 7% bonus on LifeGuard Freedom Flex is not available with a joint option.

8. Earnings on a joint or survivor annuity are calculated under the same method as each individual annuity. The earnings-sensitive adjustment that may apply to each withdrawal. GWBM earnings are not equal to the earnings used to calculate the additional free withdrawal amount under the base contract.

9. When a withdrawal is taken, the withdrawal amount will be increased by the earnings-sensitive adjustment (ESA), if any. The ESA is considered a withdrawal and will reduce the contract value, remaining premium, and all other contract values in the same way as any other withdrawal. If the for-life guarantee is not in effect at the time of the withdrawal, the ESA is equal to the lesser of 40% of GMWB earnings at the time of the withdrawal, or b) the lesser of 2/3 of the maximum eligible withdrawal amount remaining and the withdrawal amount prior to any ESA, or of the greater of and the GWB minus the maximum withdrawal amount (prior to the application of the ESA) that is eligible for the ESA. The maximum eligible withdrawal amount remaining is defined as the greater of the GWA or RMD plus any earnings-sensitive adjustment in the current contract year, less all partial withdrawals made in that contract year. If the maximum eligible withdrawal amount remaining is zero, no ESA would apply.

10. At election, the GMWB death benefit is equal to the GWB. Upon any premium payment subsequent to election, the GMWB death benefit is increased by the amount of the premium payment subject to a maximum of $10 million. Withdrawals up to the GWB or RMD reduce the GMWB death benefit by the amount of the withdrawal. Withdrawals in excess of the GWB or RMD will reduce the GMWB death benefit pro-rata for the excess amount. The GMWB death benefit is not protected for bonuses or the application of the GWB adjustment. Not available with any other add-on death benefit. The GMWB death benefit is terminated if the contract value falls to zero.

11. The total annual changes are calculated as a percentage of the GWB and deducted monthly and upon termination on a pro-rata basis across the Variable Investment Options. For LifeGuard Freedom DB NY, a portion is calculated as a percentage of the GWB and a portion is calculated as a percentage of the GMWB benefit; both fees are deducted monthly and upon termination on a pro-rata basis across the Variable Investment Options only. On each contract anniversary following the effective date of the endorsement, the company reserves the right to increase the charge subject to the maximum increased amount and maximum benefit charge stated in the supplemental contract data pages. If the contract value falls to zero or the time the benefit is terminated, the charge will be discontinued.

12. On each contract anniversary following the effective date of the benefit, the GMWB death benefit will automatically step up to the contract value if the contract value is greater than the GMWB death benefit. Subject to a maximum of $10 million. Step-ups end upon annuitization or termination of the contract.

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