

# Privacy Practices Notice

We value the trust you place in us when asking us to protect and grow your assets. We must collect a certain amount of your personal information to provide you with great products and services. This Privacy Practices Notice explains the categories of information we collect from you, how we use that information, and how you may request access to your personal information we have on file.

## Information We Collect

Below is a chart describing categories of personal information. To the right, we have indicated whether we collect this type of information from consumers.

Category	Examples	Collected
Identifiers	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.	YES
Personal information categories	A 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, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	YES
Protected classification characteristics	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex, sexual orientation, veteran or military status, genetic information.	YES
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns; fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
Internet or similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
Geolocation data	Physical location or movements.	NO
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
Employment-related information	Current or past job history or performance evaluations.	NO
Non-public education information	Education records, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	NO



Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information covered by certain health insurance privacy law, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA), or clinical trial data.
- Information covered by certain privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed in the chart above from the following categories of sources:

- Directly from you or your independent agent (e.g., from documents used to apply for an annuity contract).
- Indirectly from you or your independent agent (e.g., through information we collect in the course of servicing annuity contracts).
- Directly and indirectly from activity on our website (e.g., from submissions through our website portal).

***Independent Insurance Producers.*** Your insurance producer may have other private information about you that we do not have. Any such information does not fall under this Privacy Practices Notice. Please contact your insurance producer to learn more about his or her privacy practices.

## **Use of Personal Information**

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

- To fulfill the reason for which the information is provided. For example, if you provide personal information to purchase an annuity contract, we will use that information to issue your annuity contract and administer your annuity contract after its sale and delivery.
- To process your requests, transactions, and payments and prevent transactional fraud.
- To carry out our obligations and enforce our rights arising from any contracts or agreements entered into between you and us.
- To improve our website and present its contents to you.
- For internal research, analysis, and product development.
- To respond to law enforcement requests, and as required by applicable law, court order, or governmental regulations.
- As otherwise described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.



## Sharing Personal Information

We do not sell consumer personal information to third parties. We may disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Independent insurance producers, marketing organizations, broker/dealers, banks, reinsurers, third party administrators, or other insurance companies, in order to effect, administer or enforce transactions with us, or in connection with servicing your annuity contract.
- Third parties to whom we are required to disclose such information to comply with applicable laws and regulations, respond to enforceable governmental inquiries or requests, or comply with valid legal processes.
- Third parties to whom you authorize us to disclose your personal information in connection with products or services we provide to you.

## Your Rights and Choices

**Access to Specific Information.** You have the right to request we disclose the following information to you about our collection and use of your personal information over the past 12 months.

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

**How to Request Access to Your Information.** Only you or a person who is legally authorized to act on your behalf, may make a request related to your personal information. Your request must (1) provide sufficient information to allow us to verify your identity or the identity of your authorized representative; and (2) provide adequate detail to allow us to properly understand, evaluate, and respond to it.

You may submit a request related to your personal information to us by mail or telephone using the contact information listed below:

Mail: Eagle Life Insurance Company  
Attn: Operations Department  
PO Box 71279  
Des Moines, IA 50325

Telephone: 1-866-526-0995



**Response Timing and Format.** We endeavor to respond to your request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Our response will explain the reasons we cannot comply with a request, if applicable. We will not charge a fee to respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine a request warrants a fee, we will inform you of that decision and provide a cost estimate before completing your request.

**Deletion Request Rights.** You have the right to request we delete your personal information. However, we are not required to delete your information if retaining it is necessary to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions 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 such activities.
3. Exercise free speech, ensure the right of another consumer to exercise free speech, or exercise another right provided for by law.
4. Comply with any state or federal laws or with any legal obligations.
5. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Non-Discrimination

We will not discriminate against you for exercising any of your rights described in this Privacy Practices Notice. We will not deny you goods or services, charge you different prices or rates for goods or services, provide you a different level or quality of goods or services, or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## Contact Information

If you have any questions about the information contained in this Privacy Practices Notice or the ways in which we collect and use your personal information, please do not hesitate to contact us at:

Eagle Life Insurance Company  
Attn: Compliance Department  
PO Box 71279  
Des Moines, IA 50325

