# California<br/>Privacy Policy

Last Revised: December 15, 2022

This California Privacy Policy ("Policy") provides a comprehensive statement of Brighthouse Financial's online and offline practices regarding the collection, use, sale, sharing, and retention of the personal information of California consumers that is subject to the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act of 2020 and its implementing regulations (collectively, the "CCPA"). Terms used in this Policy that are defined in the CCPA have the meanings given in the CCPA. This Policy pertains only to Brighthouse Financial's collection and processing of information in the 12 months preceding the "last revised" date above. It does not pertain to information that is not subject to the CCPA, such as information Brighthouse Financial collects as part of the application process for or the administration of its products. The words "we," "us," and "our" refer to Brighthouse Financial. The words "you" and "your" refer to the California consumer reading this Policy.

# Categories of Personal Information Collected and Retention Period

Brighthouse Financial may collect personal information about you that falls into the categories listed below and retain that information for the period specified.

Category of Personal Information	Examples	Retention Period
Personal identifiers	Name, postal address, email address	3 years for online consumers, indefinitely for shareholders
Characteristics of protected classifications under California or federal law	Age, race	3 years for online consumers, information not collected for shareholders
Commercial information	Preferences related to marketing subscriptions registered shareholder account information	3 years for online consumers, indefinitely for shareholders
Internet or other electronic network activity information	Online identifiers, IP address, browsing history, search history	3 years for online consumers, indefinitely for shareholders
Audio, electronic, visual, or similar information	Call center recordings	3 years for online consumers, indefinitely for shareholders
Professional or employment-related information	Employment history	3 years for online consumers, information not collected for shareholders
Education information	Educational background	3 years for online consumers, information not collected for shareholders
Inferences drawn from any of the above categories of information	Inferences about your preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	3 years for online consumers, information not collected for shareholders
Other personal information as defined in the California customer records law	Banking or financial account information	Information not collected for online consumers, indefinitely for shareholders
Sensitive personal information	Social Security number, driver's license number, state identification card number, passport number	3 years for online consumers, indefinitely for shareholders

# Sources of Personal Information

We collect this information from our websites, from you directly, and through our service providers' interactions with you. We may also receive your information from third-party data sources, such as unaffiliated companies that supplement our records with additional information.

# **Business Purposes for Collection**

We may use the personal information described above to operate and maintain our business and to accomplish our business purposes and objectives. For example, depending on your relationship with us, we may use your personal information:

- to maintain and service your account, including processing and fulfilling your transactions, verifying your information, and processing payments
- to develop and improve our products and services
- to communicate with you and fulfill your requests
- for security purposes
- for debugging (identification and repair of errors in functionality)
- to detect and prevent fraud, security incidents, and illegal activity (and to prosecute those responsible for such activities)
- to audit consumer transactions and interactions
- for advertising, marketing, and analytics purposes
- to conduct research
- to comply with legal requirements and exercise/defend legal claims and/or
- to undertake activities to verify and maintain the quality and safety of our services and products.

# Sharing of Personal Information

We share certain categories of personal information with vendors who provide services to Brighthouse Financial. Some of these vendors may be third parties and may share such information in de-identified form with their media partners for marketing purposes. These categories may include:

- personal identifiers
- commercial information
- internet or other electronic network activity information and/or
- inferences drawn from any other categories of information.

# Sale of Personal Information

Brighthouse does not engage in the sale of personal information.

### Children's Personal Information

Brighthouse Financial does not knowingly sell the information of consumers under the age of 16.

## Disclosure of Personal Information

We may disclose the personal information described above to external or affiliated entities for the business purposes described in these disclosures or when required by law. These entities may include vendors providing services for Brighthouse Financial or assisting us in fulfilling your transactions or administering your accounts. These entities may include:

- information technology vendors, companies that provide marketing, advertising, and analytics services (e.g., email management databases or website analytics vendors) or providers of operational services (e.g., our stockholder transfer agent)
- auditors or financial professionals and/or
- regulatory authorities or self-regulatory bodies.

# Your California Rights

Under the CCPA, you are afforded certain rights regarding your personal information, including:

- the right to request disclosure of the categories of personal information; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting, selling, or sharing personal information; the categories of third parties to whom the business discloses personal information; and specific pieces of your personal information that we collect, use, disclose, or sell (no more than two times within a given 12-month period)
- the right to request deletion of your personal information that we maintain in certain limited contexts
- the right to request correction of your inaccurate personal information that we maintain in certain limited contexts
- the right to non-discrimination, meaning we may not discriminate against you because you
  have exercised your rights under the CCPA and
- the right to opt-out of sharing or sale personal information.

# **Exercising your Rights**

- Access, Correction, and Deletion Requests: To request access to, correction of, or deletion of
  your personal information, please complete the <u>electronic form</u> or call our toll-free number at (844)
  474-8372, option 2, Monday through Friday between 8:00 a.m. and 4:00 p.m., ET. If you would like
  to submit a request by mail, please follow the directions at the bottom of the electronic form.
- Opt Out Requests: To opt out of the sharing of your personal information, please complete the <a href="electronic form"><u>electronic form</u></a> or call our toll-free number at (844) 474-8372, option 2, Monday through Friday between 8:00 a.m. and 4:00 p.m., ET. If you have enabled an opt out preference signal on your browser, the signal will only apply to online data when accessing our public sites. To opt out of sharing your personal information for offline data, you must complete the <u>electronic form</u> or call our toll-free number at (844) 474-8372, option 2, Monday through Friday between 8:00 a.m. and 4:00 p.m., ET. Opt out preference signals only apply to the browser being used when accessing our public sites. If you access our public sites from the same device and a different browser, you will need to resubmit your sharing preferences for online data.
- **Verification:** To protect the security of your information, all access, correction, and deletion requests will require verification of your identity. The information you provide on the submission form must match the information we know about you. Additionally, if you request specific pieces of your information or the correction or deletion of sensitive personal information, you may be required to provide a signed declaration under penalty of perjury and otherwise authenticate your identity.
- Requests by Authorized Agents: You are permitted to designate an authorized agent to make a CCPA consumer request on your behalf. Your authorized agent can use the methods described above to submit the request and will be required to provide proof of authorization.

# Changes to this Policy

Brighthouse Financial may change or update this Policy by posting the revised version to <a href="https://www.brighthousefinancial.com/online-privacy">www.brighthousefinancial.com/online-privacy</a> with an updated last-revised date.

# For More Information

For questions about Brighthouse Financial's privacy policies and practices:

- Email: <u>privacy@brighthousefinancial.com</u>
- Phone: (844) 474-8372
- Send mail to the following address:
   Brighthouse Financial Privacy
   P.O. Box 49781
   Charlotte, NC 28277