



# Online Privacy Statement

**Effective, January 1, 2020**

Brighthouse Financial knows you care about the privacy of your personal information. That is why we protect the information you give us when visiting our websites. This policy describes how we collect, use, and retain the information you provide to us online.

**What personal information do we collect about online visitors?**

When browsing our websites, we do not require you to give us your information. We may require you to give us your information to access certain features, such as:

- Accessing your account information,
- Asking to have us contact you,
- Asking to receive information about our products,
- Participating in a promotion or survey, or
- Requesting technical or other support.

The types of personal information we may ask you to access certain features include:

- Your first and last name,
- Postal address,
- Phone number,
- Email address,
- Policy or contract number,
- Social security number,

- Credit card number, or
- Billing address.

Additionally, we may collect personal information like your age or date of birth, gender, occupation, hobbies, and other preferences.

#### **How do we use personal information?**

We limit the personal information we collect about you to the amount necessary to fulfill your requests and complete our business objectives. For example, we may use your personal information to:

- Confirm your identity;
- Respond to your information requests;
- Administer your account information;
- Provide you with online planning tools; or
- Send you information about our products.

#### **How do we disclose personal information?**

We may disclose personal information to third parties to help us offer or administer our products. For example, we may disclose personal information to third parties to help us evaluate requests for our products or to complete transactions you request.

We may also disclose personal information if we are legally required or permitted to do so, such as in response to a court order, subpoena, or regulatory examination.

#### **How do we safeguard the personal information we collect about you online?**

We maintain physical, electronic, and procedural safeguards to protect your personal information in a manner that complies with Brighthouse Financial's policy and applicable laws. Our policy requires all of our employees to protect the confidentiality of personal information. Employees may access personal information only when there is an appropriate reason to do so, such as to process a transaction or to administer your product. Third parties who help us administer our products must agree to protect your personal information and implement their own policies, procedures, and safeguards to protect personal information in accordance with all applicable laws.

#### **What information do we collect through technology?**

When you visit one of our websites, we collect your Internet Protocol ("IP") address. An IP address is the unique identifier for the computer you use to browse the internet. We may use your IP address to study how frequently you visit areas of our websites. By itself, your IP address is not personally identifiable, but we may combine it with other personal information that you give us. Our websites do not respond to browser Do Not Track signals or similar mechanisms.

#### **Cookies and Web Beacons**

Our websites use cookies and web beacons to collect and store information. Cookies are pieces of information that a website sends to an online visitor's web browser while they view a website. These cookies help certain features of our websites run more smoothly and remember who you are. You may choose to have your web browser warn you each time a cookie is sent, or you may choose to turn off all cookies. If you do turn cookies off, some of our websites may not function properly.

Web beacons are pieces of information embedded in images on website pages and in our email communications. We and our third-party vendors use these cookies and web beacons to analyze our websites, including how frequently users visit various areas of our websites, and to better market our products and services to you. We also use web beacons in email communications to determine whether you opened our emails or clicked on links in those emails. These methods may involve transmitting information either directly to us or to another entity authorized by us to collect information on our behalf. Such information may be used to direct advertising to you based on the information collected while on our website.

#### **Children's Privacy Online**

We do not knowingly collect personal information from children under 13.

## **Purchase or Sale of Our Businesses**

When purchasing or selling parts of our businesses, your personal information may be transferred as part of the purchase or sale. If we purchase a business, we treat the personal information received with that business in accordance with all of our privacy policies, including this policy. If we sell a business, we include provisions in the selling contract requiring the purchaser to treat personal information in the same way required by our privacy policies and applicable law. This also applies if we are sold as part of bankruptcy proceedings.

## **What choices do you have about the collection, use, and sharing of their personal information?**

You may tell us not to share your information with our affiliates for their marketing purposes or non-affiliates as part of a joint marketing arrangement. Even if you do not opt out, we will not share your information with non-affiliates for their own marketing purposes. You can opt out or unsubscribe for our marketing emails at any time by contacting us at: [www.brighthousefinancial.com/optout](http://www.brighthousefinancial.com/optout)

## **Questions?**

For questions or comments, please call us at (844) 474-8372 Monday through Friday between 8:00 a.m. and 4:00 p.m., ET.

## **How will you know if we amend this Online Privacy Policy?**

We may amend this policy at any time. If we make changes to how we collect, use, or retain personal information, we will post a notice of the changes on our website.

# **California Privacy Rights and Disclosures**

## **Last Revised: July 1, 2020**

This information is provided pursuant to the rights afforded to consumers under the California Consumer Privacy Act of 2018 (the “CCPA”) and pertains to Brighthouse Financial’s collection or processing of personal information in the past 12 months (as personal information is defined by the CCPA).

The following disclosures only apply to a California consumer’s personal information that is subject to the CCPA. The disclosures do not apply to information that is not covered by the CCPA, including, for example, information that we collect from consumers that apply for or maintain Brighthouse Financial products or services.

### **Personal Information Collected, Use, and Disclosure:**

#### Categories of Personal Information Collected

Brighthouse Financial may collect personal information about you, including:

- Personal identifiers, such as your name, address, or email address,
- Online identifiers, internet or other electronic network activity, such as your IP address or search or browsing history when interacting with our websites, email communications, or advertisements,
- Commercial information, such as your marketing preferences or account information,
- Audio, electronic, visual, or similar information, such as contact center call recordings,
- Characteristics of protected classifications under California or federal law, such as your age or citizenship status,
- Professional, educational, or employment-related information, such as your employment history, educational background, or advisement firm affiliations,

- Biometric information, which includes physiological, biological or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish individual identity,
- Inferences drawn from any of the above categories of information, such as inferences reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes,
- Geolocation data, and
- Other personal information as defined in the California customer records law, such as financial account information.

#### 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 or your employer.

#### Business Purposes for Collection

We may use the categories of personal information described above to operate and maintain our business or otherwise to accomplish our business purposes and objectives. For example, depending on your relationship with us, we may use 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 to identify and repair errors in functionality,
- to detect and prevent fraud, security incidents, or illegal activity (or 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 or exercise/defend legal claims,
- to undertake activities to verify or maintain the quality or safety of our services and products, and
- to perform other necessary and appropriate internal functions.

#### 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. For example, these entities may include:

- Service providers, such as information technology vendors, companies that provide marketing, advertising, and analytics services (e.g. email management databases or website analytics vendors) or operational service providers (e.g. our stockholder transfer agent),
- Auditors or financial professionals, and
- Regulatory authorities or self-regulatory bodies.

#### **Children's Privacy Online**

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

#### **Your California Rights:**

Under the CCPA, California consumers are afforded certain rights regarding their personal information, including:

- the right to request disclosure of the categories and specific pieces of your personal information that we collect, use, disclose, or sell (no more than two times within a given twelve-month timeframe);
- the right to request deletion of your personal information that we maintain in certain limited contexts;
- the right to non-discrimination, meaning we will not discriminate against you because you have exercised your rights under the CCPA; and
- the right to request information about the type of data collected from consumers and the categories of third parties to which personal information is sold.

California consumers also have the right to opt out from the sale of personal information to third parties. In the past twelve months, Brighthouse Financial has not “sold” personal information subject to the CCPA.

#### Making a Request:

- **Access and Deletion Requests:** To request access to or deletion of your personal information, please complete the [electronic form](#) or call our toll-free number at (844) 474-8372, 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.
- **Verification:** To protect the security of your information, all access 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 deletion of certain 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 Disclosure

Brighthouse Financial may change or update these California Privacy Rights and Disclosures by posting the revised version to <https://www.brighthousefinancial.com/privacy-policy> with an updated last revised date.

#### For More Information

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

- Email: [privacy@brighthousefinancial.com](mailto:privacy@brighthousefinancial.com)
- Phone: (844) 474-8372
- Send mail to the following address:

**Brighthouse Financial Privacy**  
P.O. Box 49781  
Charlotte, NC 28277

#### Social Security Number Protection Policy

Brighthouse Financial may use and disclose Social Security Numbers to support our business activities. For example, we may use or disclose Social Security Numbers to evaluate and process requests for our products, pay benefits, or administer other transactions requested by clients, consumers, and our employees. We maintain Social Security Numbers in a secure and confidential manner. Our employees may only access or disclose Social Security Numbers to perform specific business purposes, such as the examples given above. Similarly, third-parties who perform administrative services on our behalf may only do so for specified business purposes. We prohibit our employees and third-parties from unlawfully disclosing Social Security Numbers. When we no longer need records that contain Social Security Numbers to support our business purposes, we require secure and appropriate disposal of those records.