



**Privacy Notice for California Consumers
1/1/2020**

This Privacy Notice for California Residents applies to California Residents whose data is subject to the California Consumer Privacy Act of 2018 (CCPA). Below describes what information Dearborn Life Insurance Company (DLIC) collects that is subject to the CCPA, your rights under the CCPA, and how you can exercise those rights. Any terms defined in the CCPA have the same meaning when used here.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer (“Personal Information”).

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information
- Information excluded from the CCPA’s scope, such as:
 - health or medical information covered by the Health Insurance Portability and Accountability act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA) and the Gramm-Leach-Bliley Act (GLBA).

If certain types of information are exempt from this policy would not apply, but other DLIC privacy policies may apply.

DLIC may collect an may have collected the following categories of Personal Informaion from its consumers within the last twelve (12) months:

Category	Examples
A. Identifiers	A real name, alias, address, unique personal identifier, online identifier, email address, account name, Social Security number, drivers license number, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal Civ. Code § 1798.80(e)).	Information that is protected against security breaches such as: name, Social Security number, insurance policy number, education, employment, employment history, bank account number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories may not be subject to all the rights under the CCPA.

C. Protected Classification characteristics under California or federal law.	Age (40 years or older), race, color, national origin, citizenship, or creed, marital status, veteran or, genetic information (including familial genetic information).
D. Commercial information	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
I. Professional or employment-related information	Current or past job history or performance evaluations.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

We generally do not collect additional categories of Personal Information or use the Personal Information we collected for significantly different or meaningfully unrelated purposes without providing you notice.

Where We Obtain Personal Information

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

- Directly from you. For example, from forms you complete on our website.
- Third Parties. For example, DLIC affiliates or third-party vendors.

Use of Personal Information

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

- To fulfill or meet the reason you provided the information
- To provide you with information, products or services that you request from DLIC.
- To provide you with email alerts, event registrations and other notices concerning DLIC's services, or news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and DLIC, including billing.
- To improve our website and present its contents to you
- As aggregated data for testing, research, analysis, and product development.
- As necessary or appropriate to protect the rights, property, or safety of DLIC and its employees, DLIC's clients or others.

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Sharing Personal Information

DLIC may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, DLIC has disclosed the following categories of personal information for a business purpose:

Category A:	Identifiers.
Category B:	California Customer Records.
Category C:	Protected classification characteristics under California or federal law.
Category F:	Internet History (not stored).
Category I:	Professional or employment-related information Protected Health Information that has been deidentified pursuant to the deidentification methods under HIPAA or Personally Identifiable Information that is disclosed pursuant to the requirements of the Gramm-Leach Bliley Act of 1974.

In the preceding twelve (12) months, DLIC has not sold personal information.

Your Rights and Choices

If you are a California resident, you may request that we:

- Disclose to you the following information covering the 12 months preceding your request:
 - The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 - The specific Personal Information we collected about you;
 - The business or commercial purpose for collecting (if applicable) Personal Information about you; and,
 - The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).
- Delete Personal Information we collected from you.

“Verifiable Consumer Request”

To request to exercise your rights pursuant to the terms of the CCPA, you must submit a “verifiable consumer request.” Only you, or your authorized agent, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

A verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

If we cannot verify your identity or authority to make the request, we will not be able to fulfill your request.

The information provided for verification will only be used for that purpose.

To make a request for the disclosures or deletion described above, please call 1-800-367-6401. We will respond to your request consistent with applicable law.

Non-Discrimination

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice’s effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact information

You can contact DLIC with your questions, comments, rights requests, and other CCPA-related inquiries by contacting the applicable areas below:

DLIC
Attn: Privacy Office
701 E. 22nd Street
Lombard, IL 60148

Effective Date

This Privacy Notice for California Residents is effective 1/1/2020. Certain rights granted by the CCPA will not be effective until 1/1/2023.