

## **Additional Privacy Information for California Residents**

This Privacy Notice (“Notice”) is in accordance with the California Consumer Privacy Act of 2018 (“CCPA”) which became effective on January 1, 2020. This Notice provides how Genworth Financial, Inc. and its subsidiaries and affiliates (collectively, “Genworth”) collects, uses, and discloses personal information about California residents. Personal information is defined by the CCPA to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. However, please note that not all personal information collected, used or disclosed by Genworth is subject to the CCPA. For example, the CCPA does not apply to information protected by the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act (“HIPAA”), or the Fair Credit Reporting Act (“FCRA”).

California Resident is referred to in this Notice as “you” and “your” and Genworth is referred to in this Notice as “we”, “us,” and “our.”

### **I. Information We Collect**

Over the past 12 months, we may have collected the following personal information about you depending on our specific transaction with you:

1. Identifiers such as 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 that are capable of being associated with a particular individual.
2. Personal Information, such as your financial, medical or health insurance information.
3. Characteristics of protected classifications under California or federal law, such as your race or sex.
4. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
5. Biometric information, such as voice prints.
6. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement.
7. Geolocation data, such as device location.
8. Audio, electronic, visual, thermal, olfactory, or similar information, such as call recordings.

9. Professional or employment-related information, such as your employment history.
10. Education information, such as your school records or degrees earned.
11. Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Genworth may receive this personal information directly from you or indirectly from you through your use of our websites or your other interactions with us. We may also receive this information from our affiliates, subsidiaries, agents, or service providers. Genworth collects this information for the following business or commercial purposes:

1. Marketing our products and services to you, including responding to your requests for product or service information.
2. Researching and analyzing our marketing efforts.
3. Responding to legal requests and complying with regulatory requirements.
4. Auditing our interactions and concurrent transactions with you, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
5. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity.
6. Debugging to identify and repair errors that impair existing intended functionality of our websites and other interactions with you.
7. Short-term, transient use, when your personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction.
8. Maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.
9. Undertaking internal research for technological development and demonstration.
10. Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

## **II. Information We Share**

Over the last twelve (12) months, we may have disclosed your personal information to a third party for a business or commercial purpose. The types of personal information and the business and commercial purposes are consistent with what is described in Section I of the Notice. The types of third parties we may share your personal information with include:

1. Our subsidiaries and affiliates;
2. Our sales and marketing teams;
3. Service providers or agents working on our behalf;
4. Legal and regulatory authorities; and
5. Anyone you have directed us to share your personal information.

## **III. Your Rights**

Once we receive a verifiable request from you, you have the right to request that we provide you with the following:

1. The categories of personal information we have collected about you.
2. The categories of sources from which the personal information is collected.
3. The business or commercial purpose for collecting personal information.
4. The categories of personal information that we have disclosed about you for a business purpose.
5. The categories of third parties with whom the business shares personal information.
6. The specific pieces of personal information we have collected about you.

You also have the right to request that we delete personal information about you.

Please note that we may not be able to honor all requests. The reasons we may not be able to honor your request include, but are not limited to, the following:

1. We may not be able to verify your identity;
2. We may not be able to verify you have the authority to request on behalf of someone else;
3. The information you request is exempt from the requirements of the CCPA or to the CCPA requirements of requesting to know or delete; or
4. You have requested this information more than twice during a twelve (12) month period.

Further, we are not required to provide you with information about any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained. We are also not required to reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information.

#### **IV. How to Make a Request to Know or to Delete Personal Information**

If you would like to make a request to know the personal information we have collected or maintained about you or if you would like to make a request that we delete your personal information, please submit your request calling us at 1-800-416-3624 during normal business hours, or by sending your request via e-mail to [csgenworthlhc@lhc.com](mailto:csgenworthlhc@lhc.com). Please use the subject line “CCPA – Request to Know” and/or “CCPA – Request to Delete” along with details of your specific request, so that your request can be routed properly.

You will need to indicate whether you are acting on another’s behalf and indicate in what capacity you are acting. For example, if you are acting as attorney-in-fact pursuant to a power of attorney, we will require you to provide us with a copy of the power of attorney. If not acting as an attorney-in-fact or in a manner ordered by a court, you will need to provide us with notarized written permission from the individual. If submitting an e-mailed request, you will not need to submit these documents in the initial request. We will reach out to you separately with instructions.

When you make a request to know or to delete your personal information, we will need to verify your request by confirming your identity. If you make a request through e-mail, you will be contacted and asked to provide your first and last name, whether you are an existing customer, agent/producer, or other; your telephone number; and email address. If you make a request by phone, you will be asked to provide your name, phone number, email address, whether you are a current customer or agent/producer, whether you wish to submit a request to know or to delete your information, and any other information you wish to provide. We will use the information provided to us to verify your identity. However, we may need additional information to verify your identity. If we have questions regarding your identity after we receive your request, we will contact you for additional information.

#### **V. Specific Rights for Employees and Agents and Producers**

As a job applicant, employee or contractor of Genworth or as a Producer or Agent of Genworth, you have certain rights under the CCPA. Among those rights include knowing the categories of information we collect about you and the purpose for which we will use your personal information. Also, we cannot collect additional categories of personal information about you or use your personal information for additional purposes without providing you with an additional notice. However, the CCPA does not provide you with the right to submit a request to know or a request delete personal information as stated in Sections III and IV of this Notice. Please see below for the categories of personal information Genworth collects as well as the purposes for which we collect that information.

#### A. Job Applicants, Employees, and Contractors

The categories of information we collect about job applicants, employees, and contractors may include the following:

1. Identifiers such as 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 that are capable of being associated with a particular individual.
2. Personal Information, such as your financial, medical or health insurance information.
3. Characteristics of protected classifications under California or federal law, such as your race or sex.
4. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
5. Biometric information, such as voice prints.
6. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement.
7. Geolocation data, such as device location.
8. Audio, electronic, visual, thermal, olfactory, or similar information, such as call recordings.
9. Professional or employment-related information, such as your employment history.
10. Education information, such as your school records or degrees earned.
11. Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

The purposes we collect the above categories of personal information include:

1. To properly review and assess your job application or contract.
2. To review and manage your role and performance as an employee or contractor, including any correspondence between you and Genworth.
3. To manage and administer your pay and applicable benefits, such as your health insurance and 401(k).

4. To support Genworth's efforts in maintaining a safe and supportive work environment.
5. To research, analyze and develop business or product plans.
6. To conduct investigative criminal background checks or obtain consumer reports containing information as to your character, general reputation, personal characteristics and mode of living.
7. To prevent, detect, and address any and all security incidents and illegal activity.
8. To meet any legal, regulatory, or court-ordered requirements associated with your job application, employment, or contract.

B. Agents and Producers

The categories of information we collect about producers and agents may include the following:

1. Identifiers such as 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 that are capable of being associated with a particular individual.
2. Personal Information, such as your financial, medical or health insurance information.
3. Characteristics of protected classifications under California or federal law, such as your race or sex.
4. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
5. Biometric information, such as voice prints.
6. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement.
7. Geolocation data, such as device location.
8. Audio, electronic, visual, thermal, olfactory, or similar information, such as call recordings.
9. Professional or employment-related information, such as your employment history.
10. Education information, such as your school records or degrees earned.

11. Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

The purposes we collect the above categories of personal information include:

1. To properly review and assess your application to be a Genworth agent or producer.
2. To review and manage your role and performance as an agent or producer, including any correspondence between you and Genworth.
3. To manage and administer applicable compensation, such as commissions.
4. To support Genworth's efforts in maintaining a safe and supportive work environment.
5. To research, analyze and develop business or product plans.
6. To conduct investigative criminal background checks or obtain consumer reports containing information as to your character, general reputation, personal characteristics and mode of living.
7. To prevent, detect, and address any and all security incidents and illegal activity.
8. To meet any legal, regulatory, or court-ordered requirements associated with your role as an agent or producer.

## **VI. We Do Not Sell Your Data**

We do not sell your personal information to third parties, including the personal information of minors under 16 years of age. This is also noted in our Online Privacy Policy .

## **VII. Discrimination Prohibited**

We will not discriminate against you because you exercised any of your rights under the CCPA. If you should exercise any of your CCPA rights, we will not deny you goods or services; charge you different prices or rates for goods and services, including through use of discounts, other benefits, or impose penalties; provide you a different level of goods or services, or suggest that you will receive a different price, rate, or quality for goods or services just because you exercised those rights.

## **VIII. Changes to the Notice**

We reserve the right to amend this Notice at any time. Please check the “last updated” date at the end of this Notice to see when the Notice was last updated.

## **IX. Questions or Concerns**

If you have any questions or concerns about what has been provided in this Notice, please submit your question or concern to [csgenworthltc@ltcg.com](mailto:csgenworthltc@ltcg.com) or to the following address:

Genworth Life – Group Long Term Care  
Privacy Compliance Office  
P.O. Box 64010  
St.Paul, MN 55164-0010

Last Reviewed and Updated: January 27, 2021