



## **New York Life Global Privacy Policy Summary**

This Global Privacy Policy summary includes all the salient elements of New York Life's comprehensive Global Privacy Policy ("Policy").

New York Life is entrusted with the personal information of our customers and employees, who expect us to respect and safeguard their privacy. As employees of New York Life, we are all responsible for protecting the personal information in our care.

The purpose of the Policy is to define the principles that guide New York Life's treatment of personal information and to create minimum standards applicable across all New York Life business units. These principles include transparency, security, appropriate use of data, privacy first, data quality and integrity

The Policy and the principles that underlie it apply to all New York Life companies, subsidiaries, employees, and officers. It covers all our data processing activities involving personal information we possess<sup>1</sup>.

To meet our obligations under applicable laws and regulations, we provide notices to customers detailing the personal information that we collect, for what purpose we collect it, and how we use it. We collect personal information by lawful and transparent means and use sensitive personal information only for the purposes stated in our notices.

Among New York Life's most important obligations to those who trust us with their personal information is to ensure that it is protected from unauthorized access, disclosure, or use. To that end, we implement controls to safeguard the personal information that we collect or retain.

A privacy incident occurs when personal information is or could have been disclosed to, or acquired or accessed by, a party who lacks authorization or who does not have a legitimate business purpose to access that information.

Any employee who identifies a potential or actual privacy breach is responsible for immediately reporting the incident. We strive to report all breaches to impacted individuals as soon as possible and as appropriate, provide credit monitoring or other protective services.

New York Life engages various third parties, such as agents, brokers, consultants, and vendors, among many others, in support of our businesses. Many of these third parties require access to and use of personal information to perform their contracted services. As such, we have specific requirements that we impose on third parties to protect our information.

New York Life conducts business around the world and might have occasion to transfer personal information across international borders. Some jurisdictions in which we operate strictly regulate the transfer of personal information generated within that jurisdiction to other jurisdictions, and we comply with all applicable laws whenever we transfer personal information across borders, whether that transfer is accomplished directly or indirectly through a third party. A "transfer" may be broadly construed in applicable law.

As a general rule, if personal information that has come from one jurisdiction will be made visible in any way to someone in another jurisdiction, it should be considered a cross-border transfer.

The Compliance Department creates and administers appropriate privacy training reflecting the principles described in the Policy. This training will be deployed on an annual basis. In addition, appropriate employees who are subject to stricter legal or regulatory

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<sup>1</sup> The Policy does not reflect all legal or regulatory requirements applicable to all business units. It neither supersedes applicable laws and regulations concerning personal information nor contradicts defined terms in those laws and regulations, such as "personal health information (PHI)," "personally identifiable information (PII)," or "personal data (PD)." Those business units operating in jurisdictions that impose stricter privacy requirements than are contained in the Policy must meet applicable local requirements.

requirements may also require additional training. Our Risk Management Department also accounts for privacy considerations in our Enterprise Risk Management Framework.

The Policy will be reviewed at least annually and will be revised as necessary.