

**NOTICE OF PRIVACY PRACTICES**

This Notice is provided to you by the Transamerica companies listed at the end of this Notice. It is important to us that you understand how we use and share your personal information. This Notice describes the data we collect and how we use, share, and protect it. The types of data we collect and share depend on the type of product or service you have with us. We also provide notices and terms on our websites and applications. Those notices and terms provide further detail regarding data use on our websites or applications. If your relationship with us ends, we will continue to use your data as set forth in this Notice.

This Notice only applies to products and services provided via Third Party administrators (“TPAs”) on behalf of the Transamerica companies listed at the end of this Notice. This notice does not apply to you if do not receive products or services via a TPA. Other Transamerica products or services will have a different notice.

**Data That We Collect:** We collect the following types of data from the following sources:

Data	Typical Data Sources
Contact information (e.g., name, phone number, email and physical addresses, etc.), date of birth, government ID (e.g., social security, passport and driver’s license numbers), security credentials (e.g., password, voiceprint, etc.), employment, financial and health data and history, other general information (e.g., marital status, gender, etc.)	<ul style="list-style-type: none"><li>• You directly, when you submit applications and forms and engage in communications with us</li><li>• Our affiliates (companies under common ownership)</li><li>• Employers, healthcare providers, other insurance companies and other authorized entities</li></ul>
Data about your transactions with us and/or Third Parties. (“Third Parties” are unaffiliated Third Parties. This includes agents, the company the agent represents, other financial organizations, and service providers.) Such transactional data can include, but is not limited to, account balances, accrued benefits, coverages, premiums, payment and claims history, financial transactions, and medical or health data	<ul style="list-style-type: none"><li>• Our affiliates</li><li>• Third Parties</li><li>• Transamerica’s websites, digital platforms, and applications</li><li>• Assistive technologies, mobile or wearable devices, or other similar technology</li></ul>
Credit history, employment information and other information about your creditworthiness, and medical or health data	<ul style="list-style-type: none"><li>• Consumer reporting agencies and other service providers we use such as Third Party data suppliers</li><li>• Your employers, healthcare providers, insurance support organizations (including reports prepared from such organizations which may retain and disclose such information), credit bureaus, other insurance companies and other authorized entities</li></ul>
Data about products and services you obtain or in which you might be interested	<ul style="list-style-type: none"><li>• You, including through chat functionality</li><li>• Third Parties with whom we have joint marketing arrangements</li><li>• Other Third Parties as allowed</li></ul>
Third Party data, including data you provide to Third Parties when you have authorized the Third Party to share such data with other parties, such as data collected through Third Party applications, websites, or other digital interfaces, data you have authorized us to receive, or data you have authorized Third Parties to share with us	<ul style="list-style-type: none"><li>• Third Party applications, websites, or other digital interfaces where you have agreed to share your data</li><li>• Assistive technologies, mobile or wearable devices, or other similar technology</li></ul>

**How We Use Your Data:** We use data to provide our services, communicate with you, and as allowed by law. This includes use authorized by you. For example, we may use your data to:

- Process claims and transactions,
- Research, develop, and market products and services,
- Prevent and prosecute fraud or criminal activities,
- Support online customer experiences, digital platforms, and/or applications in which you elect to participate.
- Maintain your accounts,
- Comply with applicable laws and for security purposes,
- Maintain, operate, and market our business, or

**Sharing Data:** We may share your data with Third Parties and affiliates as permitted or required by law, or when you authorize us to do so. For example, we may share your data with:

- Those who provide services to support our business, including processing claims, account maintenance, and customer service,
- Credit bureaus,
- Insurance regulators, law enforcement, governmental authorities, and other Third Parties in response to legal process or as required by law,
- Health care professionals, including to verify coverage or to provide information relating to a medical condition,
- Governmental agencies so they can decide if you are eligible for public benefits,
- Other insurance companies (including successor insurers), agents and insurance support organizations to coordinate your benefits or in connection with insurance transactions involving you,
- Group policyholders, for example, regarding claims experience or to support service audits,
- Certificate or policyholders regarding the status of an insurance transaction,
- Those who have an interest in your assets (such as creditors with a lien on your account),
- Your employer or plan sponsor as needed to support the administration of employee accounts (but only as permitted by law and only if you have established an account in connection with your employer),
- Your representatives and lawyers,
- Third Parties and affiliates to prevent and prosecute fraud or criminal activities,
- Third Parties and affiliates for actuarial or research studies, and
- Third Parties and affiliates in connection with the sale or merger of all or part of our business

You do not have the right to opt out of our sharing data with Third Parties for these legally permitted purposes.

Our affiliates include a broad range of companies who provide financial services. These include insurance companies and agencies, investment advisors, and broker/dealers, some of whom may not be included in the scope of this Notice. You may have additional privacy notices from these professionals. We do not share information about your creditworthiness among our affiliates. However, we may share information about our transactions and experiences with you among affiliates for their everyday business purposes. We do not share information for our affiliates to market to you unless authorized and consistent with law. For example, we may share your data with our affiliates:

- So they can provide various services to us to support our business, such as claims processing, applying for insurance, or opening and maintaining your account,
- So they can audit themselves or their agents, or
- So you can communicate with us or Transamerica affiliated companies about your accounts.

**Your Right of Access and Correction:** You may have a right of access and correction with respect to data we collect. To exercise these rights, please list the account or policy numbers with the data you are requesting to access. If you tell us of an error in the data, we will review it. If we agree, we will correct our records. If we don't agree, you may dispute our findings in writing and send your statement to us. We will include your statement whenever we provide your disputed information to anyone outside Transamerica. This is a summary of your rights. For a copy of our more detailed Notice of Insurance Information Practices as applicable to your product or service, please send a written request to 6400 C St. SW, Cedar Rapids, IA 52499-0001.

**Protecting Your Data:** We maintain appropriate controls to limit access to data to persons who need access to it. These persons access your data so that they can do their jobs or provide products and services to you. We train our workforce to properly handle data. In addition, we maintain other physical, technical, and administrative or procedural safeguards to protect your data.

**For Vermont Residents only:** We will not share data we collect about you with Third Parties, except as permitted by Vermont law or authorized by you. We may still share data about our transactions or experiences with you with our affiliates.

**For California Residents only:** If you are a California resident, you will receive a separate notice with additional choices.

We may revise this Notice. If we make material changes, we will notify you as required by law. This Notice is provided by the Transamerica companies below. Transamerica companies that are not covered by this notice may make available other applicable notices.

**Transamerica Capital, LLC**  
**Transamerica Financial Life Insurance Company**

**Transamerica Casualty Insurance Company**  
**Transamerica Life Insurance Company**