

# Privacy Notice

Prudential values your business and your trust. We respect the privacy of your personal information and take our responsibility to protect it seriously. This privacy notice is provided on behalf of the Prudential companies listed at the end of this notice (Prudential), and applies to our current and former customers. **This notice describes how we treat the information we receive about you, including the ways in which we will share your personal information within Prudential and your right to opt out of such sharing.**

## Protecting Your Personal Information

We maintain physical, electronic and procedural safeguards to protect your personal information. The people who are authorized to have access to your personal information need it to do their jobs, and we require them to keep that information secure and confidential.

## Personal Information We Collect

We collect your personal information when you fill out applications and other forms, when you enter personal details on our websites, when you respond to our emails, and when you provide us information over the telephone. We also collect personal information that others give us about you. This information includes, for example:

- name
- address, email address, telephone number, and other contact information
- income and financial information
- Social Security number
- transaction history
- medical information for insurance applications
- consumer reports from consumer reporting agencies
- participant information from organizations that purchase products or services from us for the benefit of their members or employees

## Using Your Information

We use your personal information for various business purposes, including:

- normal everyday business purposes, such as providing services to you and administering your account or policy
- business research and analysis
- marketing products and services of Prudential and other companies in which you may be interested
- as required by law

## Sharing Your Information

We may share your personal information, including information about your transactions and experiences, among Prudential companies and with other non-Prudential companies who perform services for us or on our behalf, for our everyday business purposes, such as providing services to you and administering your account or policy. We may also share your personal information with another financial institution if you agree that your account or policy can be transferred to that financial company.

We may share your personal information among Prudential companies so that the Prudential companies can market their products and services to you. We may also share consumer report information among Prudential companies which may include information about you from credit reports and certain information that we receive from you and from consumer reporting agencies or other third parties. You can limit this sharing by following the instructions described in this notice. For those customers who have one of our products through a plan sponsored by an employer or other organization, we will share your personal information in a manner consistent with the terms of the plan agreement or consistent with our agreement with you.

We may also share your personal information as permitted or required by law, including, for example, to law enforcement officials and regulators, in response to subpoenas, and to prevent fraud.

Unless you agree otherwise, we do not share your personal information with non-Prudential companies for them to market their products or services to you. We may tell you about a product or service that other companies offer and, if you respond, that company will know that we selected you to receive the information.

### **Limiting Our Sharing – Opt Out/Privacy Choice**

You may tell us not to share your personal information among Prudential companies for marketing purposes, and not to share consumer report information among Prudential companies, by “opting out” of such sharing. To limit our sharing for these purposes:

- visit us online at: [www.prudential.com/privacyoptout](http://www.prudential.com/privacyoptout)
- call us at: 1-877-248-4019

**If you previously told us since 2016 not to share your personal information among Prudential companies for marketing purposes, or not to share your consumer report information among Prudential companies, you do not need to tell us not to share your information again.**

You are not able to limit our ability to share your personal information among Prudential companies and with other non-Prudential companies for servicing and administration purposes.

### **Questions**

If you have any questions about how we protect, use, and share your personal information or about this privacy notice, please call us. The toll-free number is 1-877-248-4019.

We reserve the right to modify this notice at any time. This notice is also available anytime at [www.prudential.com](http://www.prudential.com).

This notice is being provided to customers and former customers of the Prudential companies listed below.

#### Insurance Companies and Insurance Company Separate Accounts

The Prudential Insurance Company of America; Prudential Annuities Life Assurance Corporation; Pruco Life Insurance Company; Pruco Life Insurance Company of New Jersey; Prudential Retirement Insurance and Annuity Company (PRIAC); CG Variable Annuity Separate Account; Prudential Legacy Insurance Company of New Jersey; All insurance company separate accounts that include the following names or are otherwise identified as maintained by an entity that includes the following names: Prudential, Pruco, or PRIAC

#### Insurance Agencies

Prudential Insurance Agency, LLC; Mullin TBG Insurance Agency Services, LLC;

#### Broker-Dealers and Registered Investment Advisers

AST Investment Services, Inc.; Prudential Annuities Distributors, Inc.; Global Portfolio Strategies, Inc.; Pruco Securities, LLC; PGIM, Inc.; Prudential Investment Management Services LLC; PGIM Investments LLC; Prudential Private Placement Investors, L.P., Prudential Customer Solutions LLC; Quantitative Management Associates LLC

#### Bank and Trust Companies

Prudential Bank & Trust, FSB; Prudential Trust Company

#### Investment Companies and Other Investment Vehicles

Prudential Mutual Funds; Prudential Capital Partners, L.P.; The Target Portfolio Trust; Advanced Series Trust; Prudential Private Placement Investors, Inc.; All funds that include the following names: Prudential, PCP, PGIM, or PCEP

#### Other Companies

Prudential Workplace Solutions Group Services, LLC; Prudential Mutual Fund Services LLC

**Vermont Residents:** We will not share information about your creditworthiness among Prudential companies, other than as permitted by Vermont law, unless you authorize us to make those disclosures.



**Prudential**

# Online Privacy Statement

**Last Updated: September 2018**

Prudential (“we” or “us”) respects your privacy, and we are committed to protecting it. This Online Privacy Statement explains how we may collect, use, share and retain information about you and about the choices you have when you:

- Visit our websites (“Websites”)
- Receive or reply to email or other electronic communications from us
- View or click on our ads or other Prudential online content
- Interact with us on social media or websites and applications maintained by other parties
- Use our software applications (“Apps”) on or through computers and mobile devices

## **Online Services Covered by this Online Privacy Statement**

This Online Privacy Statement describes our practices in connection with information we collect through Prudential.com, other Prudential websites and Apps that link to this Online Privacy Statement, and online communications that contain a link to this statement (collectively “Online Services”)

Other websites and services of Prudential may contain different privacy statements to this Online Privacy Statement and you are advised to review the privacy statement of each Prudential website.

This Online Privacy Statement does not apply to and does not address those websites or communications of third parties that have their own privacy statements or to websites of other companies or third parties that are linked to our Websites. We are not responsible for the privacy, information or practices of any third parties, including any third party operating any website or service to which the Websites link. The inclusion of a link on the Websites does not imply endorsement of the linked site or service by us or by our affiliates. To learn about the privacy policy of another website, please refer to the privacy statement for that website.

By using these Online Services, you agree to the terms and conditions of this Online Privacy Statement.

These Online Services are controlled and operated by Prudential from the United States and are intended for use by residents of the United States. They are not intended to subject Prudential to the laws or jurisdiction of any state, country or territory other than that of the United States. If you are using these Online Services from outside the United States, they may not necessarily be consistent with the laws and regulations of your home country.

## **Personal Information**

We may ask you to provide certain personal information about you or that may be used to personally identify you or to contact you. For example, you may provide us with general identification and account information such as your name, telephone number, policy or account number, mailing address, email address, or date of birth when you:

- Request a quote for insurance;
- Request that a Prudential representative contact you;
- Register for a service;
- Instruct us to perform a transaction;
- Fill out an online survey or form;
- Register for online access to access your account; or
- Download, link to or use our mobile apps or those maintained by a third party

You may also provide us with your financial information and goals when you use certain services, features, and tools on our Online Services.

We may also collect your personal information from other sources, such as publicly available databases, providers of demographic information, and social media platforms.

We need to collect personal information to provide services to you. If you do not provide the information requested, we may not be able to provide the services. If you disclose any personal information relating to other people to us or to our service providers in connection with the Websites, you represent that you have the authority to do so and to permit us to use the information in accordance with this Online Privacy Statement.

## **How We Use Personal Information**

We use personal information collected online for business purposes, including:

- **Providing the functionality of Online Services and fulfilling our customers' requests**
  - To respond to your request for a call, referral, or quote;
  - To process transactions you request;
  - To authenticate registered customers; and
  - To develop, manage, analyze and improve the use of our Websites and our advertisements on other websites
- **Providing you with marketing materials and to facilitate social sharing**
  - To inform you about products and services we offer which we believe may be of interest; and
  - To provide you with personalized content when you visit our Websites
- **Accomplishing our business purposes**

- Data analysis, audits, developing and improving products and services, identifying usage trends and determining the effectiveness of promotional campaigns, and enhancing, improving or modifying our services or Websites;
- To contact individuals in connection with existing transactions and contractual agreements;
- For risk management, fraud detection and prevention including “know your customer,” anti-money laundering, due diligence requirements, credit checks, compliance with sanction rules, fraud monitoring, and tax reporting;
- To comply with laws and regulations (including any legal or regulatory guidance, codes or opinions), and to comply with other legal process and law enforcement requirements;
- To protect the security of accounts and personal information;
- To send administrative information to you, such as changes to our terms, conditions and policies.
- To provide you with online financial tools

## **How We Disclose Personal Information**

We may disclose Personal Information collected online to:

- The Prudential family of affiliated companies
- A Prudential agent or an independent financial professional to provide you with a policy quotation or other information regarding insurance and financial service products
- Third parties as permitted or required by law, for example:
  - Regulators
  - Vendors that provide service to us
  - Law enforcement authorities
  - Credit bureaus
- For participants of Prudential Retirement Plans and/or Prudential Group Insurance policies, upon the request of your employer or plan sponsor, we may disclose site visit data to your employer or plan sponsor or a subcontractor working for your employer or plan sponsor regarding your use of our websites.

## **Other Information**

We also collect other information (“Other Information”) about visitors to our Websites. Other Information we may collect includes:

- The number of visitors to our site
- The pages visited on our site
- The features used
- How long a visitor stays
- The domain name of the site from which visitors connect to our site
- Browser and device information

- Information collected through cookies, pixel tags, and other technologies
- Information that has been aggregated in a manner such that it no longer reveals your identity

We may also collect Other Information when you download and use an App. We may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

We and our service providers may collect Other Information in a variety of other ways, including: through a browser or device; using cookies, pixel tags or other similar technologies; and through IP addresses.

A cookie is a small piece of information that a website can send to your browser and may then be stored on your computer's hard drive. It acts as an anonymous tag that identifies your computer, but not you personally. Cookies have the ability to store information about web pages viewed and the advertisements viewed or clicked. For registered customers, cookies can also save user information and screen preferences.

A pixel tag, also known as a clear GIF or web beacon, is an invisible tag placed on certain pages of our Websites but not on your computer. When you access these pages, pixel tags generate a generic notice of that visit. They usually work in conjunction with cookies, registering when a particular device visits a particular page. If you turn off cookies, the pixel tag will simply detect an anonymous website visit.

Prudential uses cookies and pixel tags to provide better customer service, and to analyze how visitors use and navigate our websites, so we can improve our Websites. Cookies also help us enhance navigation and the functionality of our Websites, to securely maintain a session for existing clients accessing password-protected areas, and to personalize aspects of a visitor's experience.

We collect information from cookies and pixel tags to evaluate responses to surveys and our advertisements on other websites and to provide you with specific or relevant content such as articles and educational material when you visit our Websites.

Some of our Websites use cookies to better serve you when you return to the website. For example, a cookie may remember your user ID to simplify your login to a password-protected page.

Prudential may also use cookies, pixel tags, or other technologies to track your use of certain partner websites. In addition, Prudential arranges for advertisements with links to Prudential Websites to be placed on third-party websites and web pages and may contract with other companies that use cookies, pixel tags, and other online technologies to collect information regarding your interaction with Prudential advertisements and your use of both Prudential and third-party websites. These other companies may also collect information about your online activities over time and across different websites. This information may be used to show you Prudential advertisements and other advertisements that may be of interest to you when you visit other websites. For more information about this practice and to learn about your choices in

connection with it, please visit. [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and <http://www.aboutads.info/> or the Ad Choices link at the bottom of our Websites.

Each browser version works in a slightly different way, but you generally have the ability to accept all cookies, be notified before accepting a cookie, block or restrict cookies from certain sites, or reject all cookies. Because many websites use cookies to allow visitors to navigate easily, you may find that some websites or pages do not work well if you reject the cookies associated with them. At this time, Prudential does not respond to browser 'do not track' signals.

We participate in the Adobe Marketing Cloud Device Co-op to better understand how you use our website and apps across the various devices you use, and to deliver tailored promotions. Learn more about privacy at Adobe by clicking here <https://cross-device-privacy.adobe.com>.

Our websites may also use Google Analytics. Google Analytics uses cookies to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Click here for an overview of privacy at Google, <https://support.google.com/analytics/answer/6004245>

We also collect information through emails. From time to time, we may send you emails about our products and services. Prudential and third parties with which we contract may collect information regarding your interaction with these emails, including whether you opened the email, how long you viewed the email, and whether you opened any links in the email.

To access online information about your Prudential account, you may register for access through <https://www.prudential.com/clientenroll>. We may collect information that you voluntarily provide on this site. If you don't want to give us this information via the Internet, you may call the following for service:

- 1-800-PRU-HELP (778-4357)
- The telephone number associated with the particular online form
- Your Prudential representative

We may also supplement the information we collect from you with information we receive from other sources. We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as personal information under applicable law, then we may use and disclose it for the purposes for which we use and disclose personal information as detailed in this Statement. In some instances, we may combine Other Information with personal information. If we do, we will treat the combined information as personal information as long as it is combined.

## **How We Protect Your Information**

Prudential seeks to use reasonable administrative, technical and physical safeguards and other security measures to protect personal information within our organization from growing threats. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to

be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contact Us*” section below.

### **Privacy Protection Policy**

Prudential collects Social Security numbers in the course of its business activities. Prudential has a privacy policy that protects personal information, including Social Security numbers. This policy requires that Prudential keep all personal information about its customers and employees, and employees of our vendors and business partners, secure and confidential.

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

Our websites are not directed toward children. We do not knowingly collect or post information from children under the age of 13. You can learn more about children's privacy and the Children's Online Privacy Protection Act (COPPA) at the Federal Trade Commission's website at <http://www.ftc.gov>.

### **Effective Date**

This Online Privacy Statement is effective as of September 2018. We reserve the right to change this statement at any time. If we change it, we will post the current privacy statement on the websites and the Privacy Center page. Any changes to this statement will be effective as of the day they are posted. Use of Online Services following these changes signifies acceptance of the revised Online Privacy Statement.

### **Contact Us**

If you have any questions about this Online Privacy Statement, please email us at [Global.Privacy@Prudential.com](mailto:Global.Privacy@Prudential.com) or call 1-800-PRU-HELP (778-4357).