Respecting your privacy in the United States

Online Privacy Policy

Introduction

At the Sun Life Financial group of companies¹ protecting your privacy is important to us. Whether you are an existing customer or considering a relationship with us, we recognize that you have an interest in how we may collect, use and share information about you.

Sun Life Financial has a long tradition of safeguarding the privacy of its customers' information. We understand and appreciate the trust and confidence you place in us, and we take seriously our obligation to maintain the confidentiality and security of your personal information.

We invite you to review this Privacy Policy which outlines how we use and protect that information.

Collection of Nonpublic Personal Information by Sun Life Financial

Collecting personal information from you is essential to our ability to offer you high-quality insurance products and service. When you apply for a product or service from us, we need to obtain information from you to determine whether we can provide it to you. As part of that process, we may collect information about you, known as nonpublic personal information, from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, social security number and date of birth;
- Information about your transactions with us, our affiliates or others, such as other insurance policies you may own; and
- Information we receive from a consumer reporting agency, such as a credit report.

Limited Use and Sharing of Nonpublic Personal Information by Sun Life Financial

We use the nonpublic personal information we collect to help us provide the products and services you have requested and to maintain and service your accounts. Once we obtain nonpublic personal information from you, we do not disclose it to any third party except as permitted or required by law.

We may share your nonpublic personal information within Sun Life Financial to help us develop innovative financial products and services and to allow our member companies to inform you about them. The Sun Life Financial group of companies provides a wide variety of financial products and services to employers and their employees, including Group and Voluntary Life, Disability, Dental, Critical Illness, Accident and Stop-Loss insurance products.

We also may disclose your nonpublic personal information to companies that help in conducting our business or perform services on our behalf, or to other financial institutions with which we have joint marketing agreements. We require them to protect the privacy of our customers' information and permit them to use and disclose it only for the purpose for which it is provided, as permitted by law.

There also may be times when Sun Life Financial is required to disclose its customers' nonpublic personal information, such as when complying with federal, state or local laws, when responding to a subpoena, or when complying with an inquiry by a governmental agency or regulator.

Our Treatment of Information About Former Customers

Our protection of your nonpublic personal information extends beyond the period of your customer relationship with us. If your customer relationship with us ends, we will not disclose your information to nonaffiliated third parties other than as permitted or required by law.

Security of Your Nonpublic Personal Information

We maintain physical, electronic and procedural safeguards that comply with federal and state regulations to safeguard your nonpublic personal information from unauthorized use or improper access.

Employee Access to Your Nonpublic Personal Information

We restrict access to your nonpublic personal information to those employees who have a business need to know that information in order to provide products or services to you or to maintain your accounts. Our employees are governed by a code of conduct and are required to maintain the confidentiality of customer information.

Questions

Questions about this Privacy Policy may be directed to SLF_US_Privacy@sunlife.com.

¹This notice applies to all Sun Life Financial companies and branches operating in the United States other than those that have adopted their own privacy policies. Massachusetts Financial Services Company and Professional Insurance Company have each adopted their own separate privacy policies.

Our online privacy statement

Your privacy is important to us. We want you to understand how we safeguard your personal information and what types of information we receive and collect when you visit our websites.

Personal information and online security

When you visit a Sun Life website, you are anonymous unless you choose to identify yourself. You are not required to provide personal information to use our websites, unless a feature requires it. For example, if you have a policy or contract with us and wish to access your account online, you will need to provide identifying information. In these cases, we have physical, electronic and procedural safeguards in place to help protect your online personal information from unauthorized use or improper access. These safeguards may include:

- Passwords and personal identification numbers (PINs): Clients can access their account information online only
 after providing identifying information and a password or PIN. This information is unique to you, and is an
 important first step in protecting your information online.
- 128-bit encryption: Sun Life Financial uses a Secure Sockets Layer (SSL) protocol to protect personal information transmitted to us electronically. SSL transmitted information is encrypted, or scrambled, to prevent unauthorized reading of the electronic communication.

Although we have physical, electronic and procedural safeguards that we believe are adequate to protect personal information, any such systems may be subject to human and operational error. In particular, because the Internet is an open system, we cannot and do not guarantee that personal information entered by you online will not be misappropriated, intercepted, modified, deleted or used by others.

Online data collection tools: Improving and evaluating website functionality and effectiveness

Sun Life, like many organizations, sometimes gathers data, such as your IP address, regarding how visitors explore our websites - information about the number of new and repeat visitors, where on the website a visitor explores, how long they visit, where they are geographically located and similar details. We may also track how many users visit advertisements promoting our products and services that appear on other company websites. All such information is collected in an aggregate form and is used to improve our websites' performance and functionality, create a better experience for our visitors and measure the response to web marketing campaigns.

Sun Life or its agents on our behalf collect this information through the use of cookies and electronic images known as web beacons.

What are cookies and web beacons?

A **cookie** is a small piece of information that a website sends to your computer where it is stored on your hard drive. The next time you visit our website, we may use the information stored on your cookie to make your visit easier. A cookie does not tell us your identity unless you have chosen to provide it to us. Cookies cannot access other information or files from your computer. There are 2 types of cookies - **session cookies** and **permanent or persistent cookies**.

A session cookie (sometimes called a "transient" cookie) is erased when you close your Internet browser and leave our website. In the United Kingdom, only session cookies are used.

A "permanent" cookie is a file that remains on your computer when you close your Internet browser. A permanent cookie can be read only by the website that created the cookie when you revisit that site. Permanent cookies are not used in all of our jurisdictions.

Cookies can identify a visitor only if the visitor has used a website's login feature. If you ask us to save your access ID to be used the next time you visit our website, we will use a permanent cookie to store your access ID in an encrypted format on your computer so that the next time you visit the website you will be recognized when you sign in. In this way, the website can recall your preferences and provide a more customized experience.

Permanent cookies have expiry dates and are automatically deleted from your computer after their expiry date. You can also clear your stored cookies via your browser preferences on your computer. However, unless you have settings that disallow cookies, the next time you visit our website, a new cookie will be added. You can set your website browser to notify you when you receive a cookie so that you can decide whether to accept or reject it. Since the procedure for altering preferences varies by browser you should check the "Help" menu of your browser to learn how to alter your cookie preferences. Please note, however, that rejecting cookies while visiting a Sun Life website may result in certain parts of the website not functioning correctly or as efficiently as if cookies were allowed.

The permanent cookies that may be placed on your computer by the Google Display Network relating to web marketing campaigns are used to increase the relevance of display ads you may see when you visit other websites that are serviced by the Google Display Network. To opt out of these cookies, select the opt out button on the <u>Google</u> <u>Privacy Centre page</u>.

Web beacons are a collective term used to refer to "pixel tags", "web beacons" or "clear GIF images" embedded in a web page and usually invisible to the user. Web beacons are used for many of the same purposes as cookies, allowing Sun Life or its agents on behalf of Sun Life to compile aggregate statistics about website usage patterns, such as how many times a link or an area on a website is clicked.

All the information collected by any of these online tracking tools is non-personal and is not used in connection with any other information that could identify you personally unless you have entered your access ID and password or provided it to us through your permanent cookie.

We may share the site visit information obtained using cookies, web beacons and other similar technologies with Google Analytics or other agents to analyze online activity on our websites or in reaction to our online advertisements.

At this time, SLF U.S. does not alter its behaviour or change its services upon receiving Do Not Track requests, as described in California Assembly Bill 370. Links to websites outside of Sun Life

To provide website visitors with more information that may be helpful to them, some of our websites contain links to other websites that are not affiliated with or maintained by Sun Life. We do not monitor the privacy practices of these third-party sites, and do not have authority over them. As a result, we do not assume any responsibility for the data collection policies and procedures of these sites.

Collection of personal information from children

Sun Life websites are not directed at children. Our member company websites do not knowingly collect information from children under the age of 18.

Please be aware that we may update and modify this online privacy statement at any time. Please review this section each time you access and/or use our websites.