

Security Mutual Life Insurance Company of New York California Privacy Notice

Last Updated: March 11, 2025

We recognize the importance of protecting the privacy of your personal data. We have implemented policies and security measures to protect the information you provide us. This California Privacy Notice (this “Notice”) describes the ways in which Security Mutual Life Insurance Company of New York (“Security Mutual Life,” “we,” “us” or, “our” in this privacy Notice) collects, processes, and discloses certain personal information about you, including personally identifiable information (“personal data”). This Notice also describes rights you may have regarding information about you and how to contact us to exercise those rights. It also describes the extent to which we may disclose that information to affiliates and non-affiliated third parties.

This Notice applies to you if you are a California resident about whom we collect personal data other than in connection with providing a financial product or service for personal or household use. This may include personal data we collect about visitors to our website, from business contacts, or from job applicants. If you are a customer of Security Mutual Life, an insured, annuitant or beneficiary (as applicable) under a policy or annuity issued by us, or if you have sought to obtain a financial product or service from Security Mutual Life, any personal data we collect or process about you in those contexts and your rights regarding that personal data is governed by our financial and insurance [Privacy Notice](#) and our [California Notice of Information Practices](#).

This Notice and the policies described herein are subject to change at any time. Accordingly, we recommend that you check for updates to the Notice on an ongoing basis. If we make changes to this Notice, we will update the date it was last changed.

Collection of Information

The table below describes how we collect personal data about you based on the categories of personal data defined by California law. Where we collect this data, we also describe the purposes for which we process it, and how we have disclosed personal data to third parties in the past 12 months. We do not necessarily collect all data listed in a particular category, nor do we collect all categories of data for all individuals.

For each category of data that we collect, we have also disclosed data in that category with our affiliates and service providers for our business purposes within the last 12 months. We may receive requests for data from regulatory authorities, our auditors and/or our legal advisors. If requested from such parties, we would disclose your personal data as appropriate.

We do not sell your personal data or share your personal data for cross-contextual behavioral advertising, as those terms are defined under California law.

<u>Category of Personal Data</u>	<u>Source of Personal Data</u>	<u>Purpose of Collecting, Processing, and Disclosure</u>
Personal 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.	We collect information in this category directly from you	To provide you with the products or services you requested; To communicate with you; To provide customer service and respond to requests or inquiries; To assist with marketing; and To protect against fraud.
Information About You. Information that identifies, relates	We collect information in this category directly from you	To provide you with the products or services you requested;

to, describes, or is capable of being associated with, a particular individual, including, but not limited to, your name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.		<p>To communicate with you;</p> <p>To provide customer service and respond to requests or inquiries;</p> <p>To assist with marketing; and</p> <p>To protect against fraud.</p>
Characteristics of protected classifications under California or federal law.	We do not collect this information	N/A
Commercial information including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	We collect information in this category directly from you	To provide you with the products or services you requested.
Biometric information.	We do not collect this information	N/A
Internet or other electronic network activity information: browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	We collect information in this category directly from you	<p>To protect against fraud; and</p> <p>To assist with marketing.</p>
Geolocation data.	We collect this information from our third-party service providers	To provide you with the products or services you requested.
Audio, electronic, visual, thermal, olfactory, or similar information.	We do not collect this information	N/A
Professional or employment-related information: such as your job title and entity affiliation.	We collect information in this category directly from you or your employer or affiliated organization sponsored program, such as a credit union	To provide you with the products or services you requested.

In addition to the categories of personal information indicated above, we also collect some categories of sensitive personal information:

<u>Category of Personal Data</u>	<u>Source of Personal Data</u>	<u>Purpose of Collection, Processing, and Disclosure</u>
Personal identifiers such as a social security number, driver's license number, passport number, or other similar identifiers.	We collect information in this category directly from you	<p>To provide you with the products or services you requested;</p> <p>To communicate with you;</p> <p>To provide customer service and respond to requests or inquiries;</p>

		To assist with marketing; and To protect against fraud.
Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	We do not collect this information	N/A
Your precise geolocation.	We do not collect this information	N/A
Racial or ethnic origin, religious or philosophical beliefs, or union membership.	We do not collect this information	N/A
The contents of your mail, email, and text messages (unless we are the intended recipient of the communication).	We do not collect this information	N/A
Your genetic data.	We do not collect this information	N/A
Your neural data.	We do not collect this information	N/A
The processing of biometric information for the purpose of uniquely identifying you.	We do not collect this information	N/A
Personal information collected and analysed concerning a consumer's health.	We do not collect this information	N/A
Personal information collected and analyzed concerning your sex life or sexual orientation.	We do not collect this information	N/A

We do not use your sensitive personal information for purposes other than those necessary to provide you with services you request from us (e.g. provide the website), to aid in protecting and securing your personal information and our systems, to verify or maintain the quality or safety of our services and systems, or as otherwise permitted under regulations or required by law.

Retention of Information

In general, we aim to keep your personal data only for as long as the information is needed to fulfill the purposes for which it is collected and processed. Security Mutual Life reserves the right to retain and use personal data for as long as necessary to comply with our legal and regulatory obligations and business requirements and/or to resolve any ongoing disputes and enforce our agreements. For the avoidance of doubt, data will not be destroyed before any regulatory retention period expires, or during a pending investigation, whether legal or regulatory.

We retain your personal information for the purposes stated in this Notice. We use the following criteria to determine retention periods:

- time required to fulfill business purposes and the terms of your contracts (as applicable), including fulfilling our obligations to you, and improving our website;
- time required to comply with applicable laws and regulations; and
- time needed to protect our rights and legal interests, including preventing fraud and responding to any complaints or claims made by you or on your behalf.

Disclosure of Information to Third Parties

We may disclose personal data to third parties under one or more of the following circumstances:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them.
- To our marketing and advertising partners.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Security Mutual Life assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Security Mutual Life about our Site users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal data:

- To comply with any court order, law, or legal process, including a response for a government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our customers, or others. (This includes exchanging information with other companies and organizations for the purposes of fraud protection.)

The categories of affiliate and non-affiliated third parties to whom we may disclose personal data includes:

- Subsidiaries, agents and affiliates;
- Service providers;
- Marketing and advertising partners;
- An insurance regulatory authority;
- Law enforcement or other governmental authority; or
- An employer or affiliated organization sponsored program, such as a credit union.

Protection of Information

We maintain physical, electronic, and procedural safeguards designed to protect your personal data. We use reasonable best efforts to require that any person or institution to which we disclose personal data will protect the confidentiality of that information and use the information only for the purposes for which we disclose the information to them. In addition, we restrict access to nonpublic personal data to those employees who need to know that information in the course of their job responsibilities. We limit access to our premises and to our computer networks and take steps to safeguard against unauthorized access to such premises and networks.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Site. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

Data Subject Rights

As a resident of California, you are entitled to the following rights with respect to personal information about you:

- **Right to access/know.** You have the right to know and request information about the categories and specific pieces of personal data we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such information. You may have the right to obtain personal data about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another entity without hindrance. Before providing any of this information, we must be able to verify your identity.
- **Right to correct.** You have the right to request correction of any inaccurate information we hold about you. We may not be able to accommodate your request if we believe it would violate any law, any legal requirements, or cause the information to be incorrect. Information solely retained for data backup purposes is generally excluded.
- **Right to delete.** Subject to certain conditions, you are entitled to request that we delete personal data about you. Before deleting information, we must be able to verify your identity. We will not delete personal data about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law. For example, we cannot delete information about you where required to be retained for regulatory purposes. We do not discriminate against you if you choose to exercise these rights.

Data solely retained for data backup purposes is principally excluded from these rights until it is restored to an active system or next accessed or used for a sale, disclosure, or commercial purpose. These rights also do not apply to pseudonymous data if the information necessary to identify the individual is kept separately and is subject to controls that prevent access to the information. Pseudonymous data is personal data that can no longer be attributed to a specific individual without the use of additional information, if the additional information is kept separately and is subject measures to ensure that personal data is not attributed to the specific individual.

Further, California law permits California residents to request—from a business with whom the California resident has an established business relationship—certain information about the types of personal information the business has shared with third parties for those third parties' direct marketing purposes, and the names and addresses of the third parties with whom the business has shared such information during the immediately preceding calendar year.

Exercising Your Rights

If you would like to exercise any of the privacy rights outlined above, please call us at 1-800-346-7171, or visit our website: <https://smlny.com/contact-us>.

You also may designate an authorized agent to make a request on your behalf. If you are submitting a request through an authorized agent, the authorized agent must provide us with your signed written permission stating that the agent is authorized to make the request on your behalf. Alternatively, your authorized agent may provide evidence of having power of attorney or acting as a conservator for you. We may also request that any authorized agents verify their identity and may reach out to you directly to confirm that you have provided the agent with your permission to submit the request on your behalf.

For some personal information requests, we may need to verify your identity before fulfilling your request. To verify your identity, we will collect information from you, including, to the extent applicable: your relationship with us, first and last name, email address, telephone number, postal address, account information, or other personal identifying information. We will match this information against information we have previously collected about you or against information available from consumer reports to verify your identity and to respond to your request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will use the personal information you provide to us when submitting a consumer request only to verify the requestor's identity or authority to make the request.

We have 45 days to respond to your request.

There may be circumstances where we will not be able to honor your request, in which case, we will notify you. For example, if you request deletion, we may need to retain certain personal information to comply with our legal obligations or other permitted purposes.

Please note that we are only obligated to respond, free of cost, to personal information requests from the same consumer up to two times in a 12-month period. In addition, under applicable state privacy law, and for the protection of your personal data, we may be limited in what personal information we can disclose.

We will maintain your rights requests for two years. This information will not be used for any other purpose except to review compliance processes; it will not be shared except as necessary to comply with a legal obligation.

Third-Party Links

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy statements. If you submit personal information to any third-party websites or service providers, your information is governed by their privacy policies. When you leave our website, we encourage you to read the privacy policy on every website you visit.

Security Mutual Life Entities and Affiliates

This Notice applies to and covers all Security Mutual Life entities that are related by common ownership or control, including but not limited to the following:

- Security Administrators, Inc.;
- SML Agency Services, Inc.; and
- Archway Technology Services, Inc.

Contact Us

If you have any questions about this Notice, please contact us through our website at <https://smlny.com/contact-us> or by calling us at 1-800-346-7171.