

# Privacy Notice

Fortitude Life Insurance & Annuity Company (“FLIAC”) or, if applicable in your state, Prudential Annuities Life Assurance Corporation<sup>1</sup> values your business and your trust. We respect the privacy of your personal information and take seriously our responsibility to protect it. This privacy notice is provided on behalf of FLIAC and applies to our current customers. **This notice describes how we treat the information we collect and receive about you, including the ways in which FLIAC will share your personal information with our affiliates, including Fortitude Reinsurance Company Ltd., Fortitude Group Holdings, LLC, and its subsidiaries (collectively, “Fortitude Re”), and with third parties.**

## Protecting Your Personal Information

We maintain administrative, technical, and physical 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 from you, such as when you fill out applications and other forms, when you visit our website, access our online customer portal, when you respond to our emails, and when you provide information over the telephone. We also collect personal information that others give us about you. We collect the following types of personal information:

- Name;
- Address, email address, telephone number, and other contact information;
- Employment and occupation, demographic, income, and financial information;
- Social Security number;
- Transaction history including underwriting and claims information;
- 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;
- Video and audio recordings, and biometric data; and
- Information gathered from your internet or network activity.

## Using Your Information

We use your personal information for various business and insurance purposes, namely:

- Routine business purposes, such as providing services to you and administering your account or policy;
- Business research and analysis;
- Data analytics, modeling, and the deployment of automated tools;
- Detecting and preventing identity theft, fraud, or misuse of your accounts; and
- As required by law.

## Sharing Your Information

We may share your personal information, including information about your transactions and experiences, among Fortitude Re, and with other companies who perform services for us or on our behalf, including, but not limited to, our primary service provider, The Prudential Insurance Company of America (“PICA”), for our everyday business and insurance 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 or in the event that we enter into a transaction to sell our business.

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.

We do not share consumer report information among affiliate companies, which would include information about you from credit reports and certain information that we receive from you and from consumer reporting agencies or other third parties.

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<sup>1</sup> Annuities are issued by Fortitude Life Insurance & Annuity Company (“FLIAC”), located in Jersey City, NJ. Variable Annuities are distributed by Prudential Annuities Distributors, Inc. (“PAD”), Shelton, CT (main office). FLIAC has retained The Prudential Insurance Company of America (“PICA”), to act as Third-Party Administrator. FLIAC, PAD, and PICA are each solely responsible for its own financial condition and contractual obligations.

We generally do not share your personal information with third parties, including our affiliates, for them to market their products or services to you except that we may share the personal information of certain of our customers with PICA or certain of its affiliates or subsidiaries for them to market their products or services.<sup>2</sup>

Note that, to the extent you have a pre-existing relationship with PICA or its affiliate entities aside from your relationship with FLIAC, PICA's privacy policy will apply to that existing relationship.

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

We do not share your personal information among affiliates or non-affiliates for marketing purposes except for the limited purpose noted above. We also do not share your consumer report information among affiliates or non-affiliates. If you wish to opt out of the personal information sharing described above:

- visit us online at: [www.prudential.com/privacyoptout](http://www.prudential.com/privacyoptout)
- call us at 1-800-879-7012

You are not able to limit our ability to share your personal information with third parties for account 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 1-800-879-7012.

We reserve the right to modify this notice at any time. This notice is also available anytime at <https://fortitudere.com/privacy-notice.pdf>. This notice is being provided to current customers of FLIAC.

### **Additional Rights for Customers in Some States**

For our customers in Arizona, California, Connecticut, Georgia, Illinois, Maine, Massachusetts, Minnesota, Montana, Nevada, New Jersey, North Carolina, Ohio, Oregon, Virginia, and Wisconsin:

- **How we collect information:** Most of the personal information we collect about you comes from information that you have provided to us in your application or communications with us. In some cases, we may request information about you from other sources, such as our affiliates and service providers, or consumer reporting agencies, for business purposes.
- **Disclosure of personal information:** FLIAC may share information with third-parties under certain circumstances, such as our affiliates for everyday business purposes or for required legal reasons, without your written authorization. **Please see above for more detailed information on how we share your data.**
- **Rights to access your information:** You have the right to submit a written request to us to access the recorded personal information we have about you that we can reasonably locate and retrieve within thirty business days from when we receive your request. You can receive a description of the nature and substance of this information in writing, by telephone, or by mail. You may also see your information in person or request to have a copy of your information mailed to you. When we respond, we will also disclose to you, if we have it recorded, who we have shared your information with in the two years prior to the request, or if not recorded, the companies to whom information is normally disclosed. We will also provide you with information on how to correct, amend, or delete your recorded personal information. We may also charge a reasonable fee to cover the costs incurred in providing you with a copy of your recorded personal information.
- **Rights to correct your information:** You have the right to submit a written request to us to correct, amend or delete your recorded personal information, except information that relates to a claim or to a civil or criminal proceeding. Within 30 business days from when we receive the request, we will inform you of our decision on your request. If you disagree with our decision, you will be able to file a concise statement explaining why you disagree and what you think is the correct information.
- **Insurance support organizations:** Additionally, information that we may get from a report prepared by an insurance support organization, which provides information to insurance companies, may be kept by the insurance support organization and disclosed to others.

### **For our customers in Vermont:**

- We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

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<sup>2</sup> Applicable to the following FLIAC product contract holders who are not customers in California, Minnesota, New Mexico, North Dakota or Vermont: PruSecure Fixed Indexed Annuity, PruSecure Advisor Fixed Indexed Annuity, Prudential Fixed Annuity with Daily Advantage Income Benefit, SurePath, SurePath Income, Prudential FlexGuard Indexed Variable Annuity, Prudential FlexGuard Income Indexed Variable Annuity.