Guardian®

Customer Privacy Notice and our promise to you

At Guardian, we value every aspect of our relationship with you, and nothing is more important to that relationship than maintaining your trust and confidence. We take our responsibility to protect your personal information very seriously. The purpose of this notice is to make you aware of our policies and procedures for collecting, disclosing, and safeguarding the information that our current and former customers provide to us.

The Guardian Corporate Families include:

- The Guardian Life Insurance Company of America
- Berkshire Life Insurance Company of America
- The Guardian Insurance & Annuity Company, Inc.
- Sentinel American Life Insurance Company
- Family Service Life Insurance Company
- Managed DentalGuard, Inc.
- Avesis Insurance Incorporated
- Managed Dental Care, Inc.
- Park Avenue Life Insurance Company
- IA PA, LLC (d/b/a IA PA Insurance Services in California)
- First Commonwealth, Inc.
- Innovative Underwriters, Inc.
- Premier Access Insurance Company
- Access Dental Plan
- DTC GLIC, LLC (d/b/a DTC GLIC Insurance Sales, LLC in California)

Collection of personal information

We collect the personal information of our customers from all of the following sources:

- Applications or other forms (such as policies) where we ask for items like your name, address, date of birth, etc.
- Your transactions with us and our affiliates (such as premium payments)
- Consumer reporting agencies and other similar sources relating to creditworthiness
- Our websites, where we capture information when you fill out forms

Disclosure of certain information

The law provides for the disclosure of certain information we collect as follows:

- With our affiliates – to administer your policy or account, or to give you information about other products and services that may be of interest to you. We may also share non-credit-related information with affiliates to develop marketing programs. We're allowed to do this without obtaining prior authorization, and the law does not allow customers to restrict these disclosures.
- We may also share with our affiliates your information about transactions and experiences with us (such as payment history).
- With your agent, broker, or representative – to service your policy or account.
- With non-affiliates – to administer your policy or account or to administer our business.
- With non-affiliates with whom we have a joint marketing agreement (such as other financial companies) – to send you information about products and services. We require all non-affiliates to keep your information confidential. We don't share your information with non-affiliates for any reason other than those above.
- With your authorization, information relating to your eligibility for insurance, including your creditworthiness, may be shared with our affiliates. You can limit this sharing by going to guardianlife.com/privacy-policy and clicking on **Limit sharing of my information**.

Note: We may also share your information if the law permits or requires sharing (for example, during the investigations of public authorities).

IMPORTANT: Why are you receiving this notice?

We're required by federal law to provide this notice when we start our relationship with you. You'll also receive it annually so long as you have a policy, contract, or other type of account with one or more of the entities listed in the Guardian Corporate Family. This requirement applies regardless whether we share any of your information. If you're a Group planholder, please share this information with your plan participants.

Confidentiality and security

Under federal law, certain disclosures may require us to allow you to "opt-out" (i.e., allow you the option to not allow certain types of information sharing). If we're considering a disclosure that would trigger your right to opt-out, we'll let you do it before your information is shared.

Any health information collected by us requires you to complete a separate authorization. We won't disclose your health information to anyone without your authorization, unless the law permits or requires us to.

Access to your personal information is restricted to only those Guardian employees who need it to service your policy or account. We have physical, electronic, and procedural safeguards that comply with applicable federal and state regulations to keep your personal information safe. If you decide to end your relationship with a member of the Guardian Corporate Family, or if your policy or account becomes inactive for some other reason, we'll continue to treat and safeguard your information as described in this notice.

The accuracy of your information is important to us. You have the right to access and to seek correction of your information. California residents also have the right to submit a written request to access, correct, amend or delete personal information associated with their insurance transactions, and to receive a response within 30 business days. If your request is denied, California residents have the right to file a statement on what they believe to be accurate and fair information and why they disagree with the denial. Contact us at the address below, or at privacy_office@glic.com, to exercise your rights or to receive a more detailed explanation of our privacy policies.