

Protection and Proper Use of Confidential and Restricted Information



WHY DOES IT MATTER?

Pacific Life is in possession of large quantities of non-public, confidential and restricted information related to our company, our customers, and our business partners. Our core value *Customer Focus*, includes our promise to protect our customers' and business partners' information from inappropriate use. Failure to do so could result in serious harm, such as unauthorized access to data. Pacific Life could also suffer widespread reputational harm and loss of competitive advantage, as well as regulatory fines and exposure to class action litigation. Therefore, you must exercise great care in the handling of this information.

HOW DOES THIS APPLY TO ME?

As an employee of Pacific Life, its subsidiaries, and affiliates you have an obligation to protect and keep non-public information confidential. Not only is it your responsibility under Pacific Life policies, it is required by numerous state and federal privacy laws and regulations.

The Enterprise Information and Security Office (EISO) is responsible for Pacific Life's Information Security Program and has developed the *Data Protection Standard* to ensure data is handled and protected. Please refer to the Data Protection Standard in the *Enterprise Information and Security Office (EISO)* SharePoint site for complete information.

WHAT ELSE DO I NEED TO KNOW?

DATA CLASSIFICATION AND HANDLING

All information and data are assigned a sensitivity level based on the appropriate audience for the information and the consequences to Pacific Life if confidentiality was compromised. The classification level then guides the selection of protective measures to secure the information. The four data classification types are: **Restricted**, **Confidential**, **Internal Use**, and **Public**.

**Attorney-Client Privilege classifications are available for members of the Office of General Counsel. See Data Classification Table for additional information.*

Refer to the *Data Classification Table* and Appendices of the *Data Protection Standard* for complete information on data classifications and proper handling.

USE OF CUSTOMER PERSONAL INFORMATION ONLY FOR PACIFIC LIFE BUSINESS PURPOSES

Our Privacy Promise to our customers states that Pacific Life will not sell personal information, will not share personal information with anyone else for their own marketing purposes, and will use personal information only to help maintain the business relationships we have with our customers. You must uphold this promise by treating customer personal information with respect and using the information only as stated in Our Privacy Promise.

RELATED POLICIES, PROCEDURES, FORMS, OR OTHER RESOURCES

- [EISO SharePoint Site](#)
- [Data Protection Standard](#)
- [Data Classification Table](#)

WHAT IF I HAVE QUESTIONS OR NEED MORE INFORMATION?

Contact your assigned *Business Information Security Officer* (BISO) or *Enterprise Compliance*.

IT STARTS WITH ME: WHAT SHOULD I DO?

PROTECT CONFIDENTIAL AND RESTRICTED INFORMATION

Keep the following in mind when you encounter **confidential** or **restricted information**:

- **Keep it private.** Don't share, distribute, copy, email, download or otherwise provide access unless there is a compelling business need.
 - If there is a compelling business need, **tread lightly**, and keep sharing limited to a need to know basis.
 - During business hours, do not display or leave information in plain view while unattended.
 - After business hours, store information in locked cabinets, drawers, or rooms. Access to locked areas should be limited to those with proper authorization and need-to-know.
 - Dispose of documents in the locked bins marked "Confidential" or use a cross-cut shredder.
- **Trash cans and recycling bins are not approved disposal locations for confidential and restricted information in any format.**
- If information must be shared, follow best practices:
 - Email containing this type of information must be encrypted when sent outside of Pacific Life.
 - All external media and mobile devices must be encrypted.
 - Pacific Life information shall only be stored on mobile devices when ALL the following conditions are met:
 - The storage shall be necessary to perform job responsibilities
 - The mobile devices shall be owned, approved, and managed by Pacific Life
 - The mobile devices shall be protected according to the requirements within this section

KNOW WHEN NON-PUBLIC INFORMATION CAN BE SHARED

Restricted, confidential, and internal use information must never be released to the public but may be shared with third-parties, such as government agencies, business partners, or consultants when there is a business need to do so and contracts or other guiding documents are in place as required.

You must follow your division's verification process before releasing personal information. Refer any telephone or written requests for employee personal information to HR Services for handling.

REPORT BREACHES OF PERSONAL INFORMATION

If you know or have reason to believe that personal information has been accessed or acquired by an unauthorized party, follow your department procedures to promptly report the incident or contact [Enterprise Compliance](#).

DEFINITIONS

- **Confidential Information:** is highly valuable, sensitive business information and the level of protection is dictated internally by Pacific Life. Confidential information may be shared with authorized employees, contractors and business partners who have a business need, but may not be released to unauthorized parties.
- **Internal Use Information:** is information originated or owned by Pacific Life or entrusted to it by others. Internal Use information may be shared with authorized employees, contractors and business partners who have a business need, but may not be released to the general public, due to the negative impact it might have on the company's business interests.
- **Public Information:** is information that has been approved for release to the general public and is freely shareable both internally and externally.
- **Restricted Information:** is highly valuable, highly sensitive business information and the level of protection is dictated externally by legal and/or contractual requirements. Sharing or access to Restricted information must be granted as permitted under the terms of any legal and/or contractual requirements and absent strict limitations shall be limited to only authorized employees, contractors and business partners with a specific business need.