

# Privacy Notice to California Resident Insurance Producers

This Privacy Notice (the “Privacy Notice”) supplements the information contained in Pacific Life’s Website Policy Notice and applies to insurance producers who reside in California (collectively, “Consumers” or “you”). Pacific Life Insurance Company ( “Pacific Life,” “us” or “we”) is providing this Privacy Notice to describe the Personal Information we collect, sources we collect it from, how we use it in connection with your relationship with Pacific Life or any of its affiliates and subsidiaries, who we share it with, how long we keep your Personal Information, and what rights you have over your Personal Information under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act ( collectively “CCPA”). Any terms defined in the CCPA have the same meaning when used in this Privacy Notice

## Categories of Personal Information We Collect

“Personal Information” is information that identifies, relates to, describes, references, is reasonably capable of being associated, or could reasonably be linked, directly or indirectly with a particular consumer, household, or device (“Personal Information”). For example, it could include your name, social security number, email address, records of products purchased, internet browsing history, geolocation data, fingerprints, and inferences from other personal information that could create a profile about your preferences and characteristics. “Sensitive Personal Information” is a specific subset of personal information that includes certain government identifiers (such as social security numbers).

Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

The following chart details which categories of Personal Information we have collected for our operational business purposes within the last 12 months:

<b>Categories of Personal Information</b>	<b>Examples</b>
<b>Identifiers</b>	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
<b>Financial Information</b>	Bank account number, credit card number, debit card number, or any other financial information
<b>Protected Classifications Information</b>	Protected classification characteristics described under California law, such as race, religion, sexual orientation, gender identity, marital status, age
<b>Internet and Network Activity Information</b>	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an internet website application

<b>Categories of Personal Information</b>	<b>Examples</b>
<b>Professional or Employment-Related Information</b>	Work history and prior employer
<b>Audio, electronic, visual, thermal, olfactory, or similar information</b>	Sensory information which includes voice, video recordings, photographs
<b>Sensitive Personal Information</b>	Social Security number, driver's license number, passport number, account login, contents of mail, email, and text messages
<b>Inferences Drawn from Personal Information</b>	Profile created by analyzing information provided
<b>Geolocation</b>	Using IP address of a device to estimate its geographical location for security monitoring purposes.

## How Do We Collect Your Personal Information?

We obtain Personal Information from the following categories of sources:

- Information you provide to us directly, or other individuals acting on your behalf, such as information provided in your application, training certificates, licenses, emails, and calls with us;
- Information we collect or receive from service providers, such as our contract holders who may be your clients, claim administrators and investigators, government or administrative agencies, or Departments of Insurance;
- Automated technologies on our websites;
- Publicly available sources, including information available from the media and other records and information available by federal, state, and local government entities; and/or
- Our affiliates and subsidiaries.

## Why We Collect Personal Information and How Do We Use And Disclose it?

Pacific Life uses the following categories of Personal Information for the following purposes and may disclose this information to certain categories of third parties. Our service providers are obligated by a written contract to adopt appropriate security measures that safeguard your Personal Information in alignment with our guidelines and the data protection requirements and restricted to use of your Personal Information for only the purpose of performing the services contracted.

Effective January 21, 2025

<b>Business Purpose</b>	<b>Categories of Personal Information</b>	<b>Disclosed to which categories of third parties for Operational Business Purposes</b>
<b>Appointment-related purposes</b>	Identifiers; Financial Information; Professional or Employment Information; Protected Classifications Information; Sensitive Personal Information; Inferences Drawn from Personal Information	Our affiliates and subsidiaries; third party service providers and contractors; trusted business partners that support provisions of services and products.
<b>Compensation-related purposes</b>	Identifiers; Financial Information; Professional or Employment Information; Protected Classifications Information; Sensitive Personal Information	Our affiliates and subsidiaries; third party service providers and contractors; trusted business partners that support provisions of services and products; public entities including tax and other regulatory agencies.
<b>Business-related purposes</b>	Identifiers; Financial Information; Professional or Employment Information; Protected Classifications Information; Sensitive Personal Information; Audio/Visual	Our affiliates and subsidiaries; third party service providers and contractors; trusted business partners that support provisions of services and products; public entities including tax and other regulatory agencies.
<b>Internal compliance-related purposes</b>	Identifiers; Financial Information; Professional or Employment Information; Protected Classifications Information; Sensitive Personal Information	Our affiliates and subsidiaries; third party service providers and contractors; trusted business partners that support provisions of services and products.
<b>IT-related purposes</b>	Identifiers; Financial Information; Professional or Employment Information; Protected Classifications Information; Sensitive Personal Information	Our affiliates and subsidiaries; third party service providers and contractors; trusted business partners that support provisions of services and products.
<b>Legal and regulatory purposes</b>	Identifiers; Financial Information; Professional or Employment Information; Protected Classifications Information; Sensitive Personal Information	Our affiliates and subsidiaries; third party service providers and contractors; trusted business partners that support provisions of services and products; public entities including tax and other regulatory agencies.
<b>Finance and audit-related purposes</b>	Identifiers; Financial Information; Professional or Employment Information; Protected Classifications Information; Sensitive Personal Information; Audio/Visual	Our affiliates and subsidiaries; third party service providers and contractors; trusted business partners that support provisions of services and products; public entities including tax and other regulatory agencies.

## Do We Sell Or Share Your Personal Information and/or Sensitive Personal Information?

Under the CCPA, if a business “sells” or “shares” Personal Information for purposes of cross-context behavioral advertising, it must allow California residents to opt out of the sale or sharing of their Personal Information. **However, we do not sell or share and have not sold or shared Personal Information, including sensitive Personal Information in the preceding (12) months as these terms are defined in the CCPA.** We do not sell or share Personal Information, including Sensitive Personal Information of minors under 16 years of age, subject to your consent where required by applicable law. We may use Sensitive Personal Information for purposes of performing services for our business, providing goods and services as requested by you, ensuring security and integrity, using in short terms transient form, such as displaying first party, non-personalized advertising, servicing accounts, providing customer service, verifying customer information, processing payments, performing activities related to fraud investigation, quality and safety control, and product and services improvement.

## Retention of Personal Information?

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods includes:

- The length of time you have an ongoing relationship with us, and we provide services and products to you, for example for as long as you have a contract with us, and the length of time thereafter during which you may have a legitimate need to retain your Personal Information.
- Whether there is a legal obligation to which we are subject, for example, certain laws require us to keep records of our transactions with you for a certain period of time before we can delete them, or
- Whether retention is advisable in light of our legal position, such as in regard to applicable statutes of limitation, litigation, or regulatory examinations.

## What Are Your Rights?

You have the following rights regarding the collection and use of your Personal Information, subject to certain exceptions.

**Right to Receive Information on Privacy Practices:** You have the right to receive the following information at or before the point of collection:

- The categories of your Personal Information to be collected;
- The purposes for which the categories of Personal Information are collected or used;
- Whether or not that Personal Information is sold or shared;
- If the business collects Sensitive Personal Information, the categories of Sensitive Personal Information to be collected, the purposes for which it is collected or used, and whether that information is sold or shared;

Effective January 21, 2025

- The length of time the business intends to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period.

We have provided such information in this Privacy Notice, and you may request further information about our privacy practices by contacting us at the contact information provided below.

**Right to Request Deletion:** you may request that we delete any Personal Information about you that we collected from you.

**Right to Request Correction:** you may request that we correct any inaccurate Personal Information we maintain about you.

**Right to Know:** you may request that we provide you with the following information about how we have handled your Personal Information in the 12 months preceding your request:

- The categories of Personal Information we collected about you;
- The categories of sources from which we collected such Personal Information;
- The business or commercial purpose for collecting, Selling, or Sharing Personal Information about you;
- The categories of Third Parties with whom we disclosed such Personal Information; and
- The specific pieces of Personal Information we collected about you.

**Right to Non-Discrimination:** You have the right not to be discriminated against for exercising your rights. We will not discriminate against you for exercising your rights under the CCPA.

**Rights to Opt-Out of the Sale and Sharing of Your Personal Information and to Limit the Use And Disclosure of Your Sensitive Personal Information:** You have the right to opt-out of the sale and sharing of your Personal Information. You also have the right to limit the use of your Sensitive Personal Information to the purposes authorized by the CCPA. We do not sell or share Personal Information. Further, we do not use Sensitive Personal Information for purposes beyond those authorized by the CCPA. For purposes of the CCPA, a “Sale” is the disclosure of Personal Information to a Third Party for monetary or other valuable consideration, and a “Share” is the disclosure of Personal Information to a Third Party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

## How Do We Verify Your Identity?

We may ask you to provide information that will enable us to verify your identity in order to comply with your request. In particular, if you authorize an agent to make a request on your behalf, we may require the agent to provide proof of signed permission from you to submit the request, or we may require you to verify your own identity to us or confirm with us that you provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under the CCPA. We will respond to your request consistent with applicable law.

Effective January 21, 2025

## How To Exercise Your Rights?

Insurance Producers who reside in California have certain rights with respect to the collection and use of their Personal Information. You may access these data rights by contacting us via one of the methods listed in the Contact Information section below.

### Authorized Agent

You have the right to designate an authorized agent to make a request on your behalf. You can designate the agent by providing them with written permission signed by you to act on your behalf. On your behalf, an authorized agent can make a request to know, delete, or correct by contacting us at our contact information below. As part of our verification process, we may request that the agent provide, as applicable, proof concerning his or her status as an authorized agent. In addition, we may require that you verify your identity as described in the “How do we verify your identity” section or confirm that you provided the agent permission to submit the request.

### De-identified Information

Where we maintain or use de-identified information, we will continue to maintain and use the de-identified information only in a de-identified fashion and will not attempt to re-identify the information.

## Changes to Our Privacy Notice

This Privacy Notice was last updated January 21, 2025. We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make material changes to this Privacy Notice, we will post the updated Policy on our website and listing the effective date of such changes.

## Contact Information

If you have any questions or comments about this Privacy Notice, the methods used to collect your Personal Information and your choices and rights regarding our use, or if you wish to exercise your rights under California law, please contact us at [PrivacyMatters@pacificlife.com](mailto:PrivacyMatters@pacificlife.com), call us at 1-(877)-722-7848, access the forms at <https://www.pacificlife.com/home/privacy-and-other-policies/your-personal-information.html>, or write to us at:

Pacific Life Privacy Office  
700 Newport Center Drive  
Newport Beach, CA 92660