

APPLICANT PRIVACY POLICY

Last Updated: 03/29/2024

Pacific Life (collectively, “Pacific Life,” “we” or “us”) value your trust and are committed to the responsible management, use, and protection of personal information. This Applicant Privacy Policy (“Policy”) describes our practices in connection with the information that we collect through the Careers section of our website (“Careers Site”) and offline in connection with your application for a job or internship with Pacific Life. Personal information submitted elsewhere on Pacific Life’s websites will be used in accordance with our general online privacy notices.

COLLECTION AND DISCLOSURE OF PERSONAL INFORMATION

The following chart details which categories of personal information we may collect and process, as well as which categories of personal information we may disclose to third parties for our operational business and employment purposes, including within the 12 months preceding the date this Policy was last updated. See the “Disclosure and Transfer of Information” section below for more information on the listed categories of third parties.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
Identifiers , such as name, postal address, email address, account name, online identifiers	Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities
Customer Records Information , such as name, contact information, signature, Social Security number, passport number; financial, education and employment information, physical characteristics, or description	Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities
Protected Class Information , such as gender, race, disability, citizenship, gender identity and expression, primary language, and immigration status	Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities
Commercial Information , such as travel information and expenses	Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities
Biometric Information , such as faceprints and voiceprints, collected and used for video and audio interview recording, including answers to job related questions	Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
<p>Internet or Network Activity Information, such as interactions with our online properties and access and activity logs for our website or online application portal</p>	<p>Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities</p>
<p>Geolocation Data, such as approximate location of devices used to access our website or online application portal, derived from IP address</p>	<p>Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities</p>
<p>Audio/Video Data. Audio, electronic, visual, and similar information, such as photographs and call and video recordings</p>	<p>Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities</p>
<p>Education Information subject to the federal Family Educational Rights and Privacy Act such as student transcripts, academic standing, and confirmation of graduation</p>	<p>Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities</p>
<p>Employment Information. Professional or employment-related information, such as work history and prior employer, information from reference checks, work experience, qualifications, training and skills, work authorization, CV, résumé, cover letter, professional and other work-related licenses, permits, and certifications held, details of the employment sought and willingness to relocate, and publicly accessible information posted on your professional social media accounts</p>	<p>Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities</p>
<p>Sensitive Personal Information.</p> <ul style="list-style-type: none"> • Personal information that reveals an individual’s Government issued unique id such as; Social Security, driver’s license, identification card, or passport number; account log-in; racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, or union membership 	<p>Affiliates, Subsidiaries, Service Providers, Professional Advisors, Public and Governmental Authorities</p>

PURPOSES FOR THE COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION

The information that you submit on the Careers Site will be used for Pacific Life’s global personnel recruitment, management, and planning purposes, as permitted by applicable law.

- To process your application. We will engage in these activities based on our legitimate interests;
- To assess your capabilities and qualifications for a job. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To conduct reference checks. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To respond to your inquiries and communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To comply with or monitor compliance with any applicable law or regulation. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To analyze and monitor the diversity of job applicants, in accordance with applicable law. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To preserve our other legitimate interests, for example, for Pacific Life's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Pacific Life and its affiliates;
- To comply with applicable law, respond to requests from public and government authorities, and cooperate with law enforcement. This can include laws and authorities outside your country of residence. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- For other legal reasons, such as to enforce our terms and conditions; and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others. We will engage in these activities to comply with a legal obligation or based on our legitimate interests; and
- In connection with a sale or business transaction. We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

If we hire you, personal information we collect in connection with your application can be incorporated into our human resources systems and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing personal information to us through the Careers Site is voluntary. However, if you do not provide sufficient key information, Pacific Life may be unable to consider your application or, if you are hired, your subsequent promotion, transfer, or relocation.

PURPOSES FOR THE COLLECTION, USE, AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION

We will collect, use, and disclose sensitive personal information only as permitted by applicable law. Otherwise, we ask that you avoid submitting information that may qualify as sensitive information under applicable law, except where such information is legally required.

We may collect, use, and disclose sensitive personal information for purposes of: performing services on behalf of our business; performing services as requested by you; ensuring the quality or safety of services we control or improving those services; ensuring the security and integrity of our infrastructure and the individuals we interact with; short-term transient use; securing the access to, and use of, our facilities, equipment, systems, networks, applications, and infrastructure; preventing, detecting, and investigating security incidents; resisting and responding to fraud or illegal activities; and other collection and processing that is not for the purpose of inferring characteristics about an individual. We do not use or disclose sensitive personal information for additional purposes.

DISCLOSURE AND TRANSFER OF INFORMATION

We may disclose personal information to the following third parties for our operational business and employment purposes:

- **Affiliates.** Pacific Life shares personal information with affiliates that are involved in evaluating candidates for a given position. Pacific Life will remain responsible for personal information that is shared with affiliates. We will limit access to personal information to personnel with a business need to know the information for the purposes described in this Policy, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying.
- **Service Providers.** Pacific Life also shares personal information with our third-party service providers to facilitate services they provide to us, including hosting and operating the Careers Site, recruiting assistance, and background check processing, consulting, IT and other services.
- **Professional Advisors.** Pacific Life shares personal information with our professional advisors, such as lawyers.
- **Public and Governmental Authorities.** Pacific Life shares personal information with regulatory authorities and law enforcement to respond to requests and comply with applicable law.

Your personal information may be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information. As required by applicable law, we implement safeguards to protect your personal information when we transfer it outside your country of residence. For example:

- *For transfers from the European Economic Area (EEA) or the United Kingdom (UK):* Some jurisdictions outside of the EEA/UK are recognized by the European Commission and/or the UK government as providing an adequate level of protection according to EEA/UK standards: the list of the EEA's adequate jurisdictions is available [here](#), and the list of the UK's adequate jurisdictions is available [here](#). For transfers from the EEA and/or the UK to countries not considered adequate by the European Commission or the UK government (as applicable), we

have put in place adequate measures, such as International Data Transfer Agreements adopted by the relevant authority, to protect your Personal Information. International Data Transfer Agreements (IDTA's) Applicants in the EEA and the UK may obtain a copy of these measures by contacting us in accordance with the "Contact Us" section below.

DATA RETENTION

We will retain personal information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are: (i) the duration of the application process; (ii) as long as we have an ongoing relationship with you; (iii) as required by a legal obligation to which we are subject; and (iv) as advisable in light of our legal position, such as in regard of applicable statutes of limitations, litigation, or regulatory investigations.

We may remove personal information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, Pacific Life can delete personal information about you (including your CV/résumé) from our database at any time and without providing any reason. Therefore, please retain your own copy of the personal information provided to us.

If your application results in a work arrangement with Pacific Life, the information you provide as an applicant becomes part of your personnel file subject to Pacific Life's data retention policy.

If your application is not successful, we will keep your personal information for either four (US job applicants) or six (non-US job applicants) years from the date of your most recent application with us unless you choose to delete it sooner. You can delete your personal information at any time by logging into Workday, selecting "Account Settings" and then choosing the option "Delete Profile" on your applicant profile. If you choose to leave your data on our system, we may contact you about other jobs that may be of interest to you.

SOURCES OF PERSONAL INFORMATION

We collect most of this personal information from you directly. Any information you submit through the Careers Site and any other media, must be true, complete, and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

If you provide us with personal information of a reference or any other individual as part of your application, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

For the purpose of reviewing and evaluating your application, and as permitted by applicable law, Pacific Life may obtain information about you from other sources:

- Your references
- Third-party recruiters
- Prior employers
- Publicly available records and databases
- Educational institutions you attended
- Professional licensing bodies and organizations

PASSIVE INFORMATION COLLECTION: COOKIES AND SIMILAR TECHNOLOGY

We and our service providers use “cookies” and similar technologies on the Careers Site. Please see our [online privacy policy](#) for more information.

RIGHTS REQUESTS

If you register on the Careers Site, you may access, review, and change your personal information stored therein by logging into the Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change personal information that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your personal information if it changes or is inaccurate.

To the extent the right is provided to you by applicable law, you may request: to review, confirm, access, correct, update, suppress, restrict, delete, or object to or opt out of the processing of your personal information; and to receive an electronic copy of your personal information, including, where applicable, a copy of your personal information for purposes of transmitting it to another company.

To make a privacy request, please contact us in accordance with the “*Contact Us*” section below. In your request, please make clear what personal information you would like to access or have changed, whether you would like to have personal information that you have provided to us suppressed from our database. We will try to comply with your request as soon as reasonably practicable and in accordance with any applicable law.

We may need to request additional information, such as name, email address, and information on the last job applied for through the Careers Site, to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your personal information.

When provided by applicable law, you may also lodge a complaint with a data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of EEA data protection authorities is available at <https://ec.europa.eu/newsroom/article29/items/612080>, and the UK Information Commissioner’s Office’s contact details can be found <https://ico.org.uk/global/contact-us/>.

California Residents Only

If you are a California resident, you may, in addition to the rights requests listed above, request to obtain more information about the categories and specific pieces of personal information we collected, used, or disclosed, the sources for such personal information, the business and commercial purposes for which we collect personal information, and the categories of third parties to whom it was disclosed.

To make a privacy request as a California resident, please contact us in accordance with the “*Contact Us*” section below. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the personal information subject to the request. We will not unlawfully discriminate against you for exercising your rights under applicable law.

If you are a California resident and an agent would like to make a request on your behalf as permitted by applicable law, the agent may contact us as described in the “*Rights Requests*” section above. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described in the “*Rights Requests*” section above or confirm that you provided the agent permission to submit the request.

We do not “sell” or “share” your personal information, including your sensitive personal information, as defined under the California Consumer Privacy Act. We have not engaged in such activities in the 12 months preceding the date this Policy was last updated. Without limiting the foregoing, we do not “sell” or “share” the personal information, including the sensitive personal information, of minors under 16 years of age.

SECURITY

We seek to use reasonable organizational, technical, and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contact Us*” section below.

Pacific Life hereby disclaims, as far as permitted by local laws, any liability for itself and Affiliates, Service Providers, and Professional Advisors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered, or destroyed or not timely delivered to our Careers Site.

LINKS TO THIRD-PARTY WEBSITES

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by Pacific Life or our affiliates.

LAW APPLICABLE TO JOB APPLICATION

The Careers Site allows you to apply for jobs worldwide, as a benefit of Pacific Life’s centralized global recruitment function. This Careers Site is operated from the United States. Accordingly, any personal information you submit to the Careers Site will be collected in the United States and will be subject to United States laws.

If we share your personal information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your personal information in accordance with this Policy. **Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.**

ABOUT MINORS

The Careers Site is not intended for minors under the age of 18.

CHANGES TO THE POLICY

We reserve the right to amend this Policy at any time in order to address future developments of Pacific Life, the Careers Site or changes in industry or legal trends. The “Last Updated” legend at the top of this Policy indicates when this Policy was last revised. Any changes will become effective when we post the revised Policy on the Careers Site.

CONTACT US

If you have questions or requests about this Policy as a US applicant, please feel free to contact us at PrivacyMatters@PacificLife.com or by mail to:

Pacific Life Insurance Company
Enterprise Compliance, Privacy Operations
700 Newport Center Drive
Newport Beach, CA 92660

If you have questions about this Policy as any other applicant, please email dpo@pacificlifere.com.

Pacific Life Re Data Protection Officer
Tower Bridge House
St. Katharine’s Way
London E1W 1BA UK

If, as a California resident, you wish to make a privacy request, as stated above, please contact us at AskHR@pacificlife.com, toll-free at 1-800-800-7646, or by mail to:

Pacific Life Insurance Company
Human Resources Department
700 Newport Center Drive
Newport Beach, CA 92660

Because email communications are not always secure, please do not include sensitive information in your emails to us.

Pacific Life, as referred, means Pacific Life Insurance Company, its affiliates, and subsidiaries, including, but not limited to, Pacific Life & Annuity Company, Pacific Select Distributors, LLC and the various entities comprising the Pacific Life Re Division.