



## California Consumer Privacy Act Privacy and Notice at Point of Collection

300 Crescent Ct, Suite 700 Dallas, Texas 75201  
214-550-8341

The following disclosures are made pursuant to the California Consumer Privacy Act ("CCPA") on behalf of Spiritus Life, Inc. (its successors and assigns) (hereafter referred to as "Spiritus," "we," or "our").

We value your trust and is committed to the responsible management, use and protection of personal information. This California Consumer Privacy Act Privacy Policy and Notice at the Point of Collection ("CCPA Notice") is applicable to the personal information we collect about California residents (defined by the CCPA as "consumers") ("you" and "your") to the extent the personal information is subject to the CCPA.

This CCPA Notice informs consumers, at or before the time of collection of consumers' personal information, of the categories of personal information we collect from them and the purposes for which the categories of personal information will be used. This CCPA Notice also provides consumers with a description of our online and offline practices regarding the collection, use, and disclosure of personal information and the rights of consumers regarding their personal information pursuant to CCPA.

This CCPA Notice does not apply to consumers' personal information exempted from the CCPA, such as personal information collected pursuant to the federal Gramm-Leach-Bliley Act (GLBA) and its implementing regulations or the California Financial Information Privacy Act.

This CCPA Notice supplements, and does not replace, other applicable policies, practices and privacy notices that may relate to specific business relationships consumers have with us or to certain products or services, such as our Online Privacy Policy.

The below chart reflects the categories of personal information we have collected from California consumers over the past twelve months, the categories of sources from which the information was collected, the business or commercial purpose(s) for which the information was collected, and the categories of third parties with whom we shared that information.

Categories of Personal Information Collected	Categories of Sources of Collection	Business/Commercial Purpose for Collection	Categories of Third Parties Receiving Personal Information
<p><b>A) Identifiers</b> such as real 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</p>	<p>You, Third Party Source(s), Our Website(s), Publicly Available Information</p>	<p>Provide services to you; Respond to questions; Provide you with information about our services; Enhance customer experience; Detect security incidents and protect against fraud or illegal activity; Conduct hiring and/or other human resources activities; For research, analysis, and product development; To evaluate or process a commercial transaction; As permitted or required by applicable law or government regulation</p>	<p>Our affiliates; Service providers; Business partners to further a commercial or business transaction</p>
<p><b>B) Personal information categories listed in Cal. Civ. Code § 1798.80</b> such as name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Note, some personal information included in this category may overlap with other categories.</p>	<p>You, Third Party Source(s), Our Websites(s), Publicly Available Information</p>	<p>Provide services to you; Respond to questions; Provide you with information about our services; Enhance customer experience; Detect security incidents and protect against fraud or illegal activity; Conduct hiring and/or other human resources activities; For research, analysis, and product development; To evaluate or process a commercial transaction; As permitted or required by applicable law or government regulation</p>	<p>Our affiliates; Service providers; Business partners to further a commercial or business transaction</p>

<b>C) Protected classification characteristics under California or federal law</b> such as age, race, national origin, citizenship, marital status, sex, gender identity, sexual orientation, medical conditions (including pregnancy or childbirth, physical or mental disability or related medical conditions), parental status, veteran or military status.	You, Third Party Source(s), Publicly Available Information	Provide services to you; Enhance customer experience; Conduct hiring and/or other human resources activities; For research, analysis, and product development; To evaluate or process a commercial transaction; As permitted or required by applicable law or government regulation	Our affiliates; Service providers; Business partners to further a commercial or business transaction
<b>D) Commercial information</b> such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	You, Third Party Source(s)	Provide services to you; Enhance customer experience; Detect security incidents and protect against fraud or illegal activity; For research, analysis, and product development; To evaluate or process a commercial transaction; As permitted or required by applicable law or government regulation	Our affiliates; Service providers; Business partners to further a commercial or business transaction
<b>E) Biometric information</b>	We do not collect	N/A	N/A
<b>F) Internet or other similar network activity</b> such as browsing history, search history, information on interactions with an internet website, application, or advertisement.	You, Third Party Source(s), Our Website(s)	Provide services to you; Enhance customer experience; Detect security incidents and protect against fraud or illegal activity	Our affiliates; Service providers; Business partners to further a commercial or business transaction

<b>G) Geolocation data</b> such as physical location or movements	We do not collect	N/A	N/A
<b>H) Sensory data</b> such as Audio, electronic, visual, thermal, olfactory, or similar information.	We do not collect	N/A	N/A
<b>I) Professional or employment-related information</b> such as current and prior employment, performance evaluations, and results of background checks	You, Third Party Source(s), Publicly Available Information	Provide services to you; Enhance customer experience; Conduct hiring and/or other human resources activities; For research, analysis, and product development; To evaluate or process a commercial transaction; As permitted or required by applicable law or government	Our affiliates; Service providers; Business partners to further a commercial or business transaction
<b>J) Non-public education information defined in 20 U.S.C. Section 1232g, 34 C.F.R. Part 99</b> such as Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	You	Conduct hiring and/or other human resources activities	Our affiliates

<b>K) Inferences drawn from other personal information</b> such as Information reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitude, intelligence, ability, aptitude, and any other inferences drawn from your personal information.	You, Third Party Source(s)	Provide services to you; Enhance customer experience; Conduct hiring and/or other human resources activities; For research, analysis, and product development	Our affiliates; Service providers
<b>L) Medical Information</b> Limited Use (COVID-19)	You	Body temperature; thermal body temperature	The purpose of collection and use is solely to reduce the risk of spreading COVID-19 in NexAnnuity facilities. This information is only collected upon physical entrance to NexAnnuity facilities and is maintained on a strictly confidential and limited basis.

In the past twelve months, we have disclosed personal information to third parties for business or commercial purposes. The categories of personal information we have disclosed to third parties for business or commercial purposes include categories **A, B, C, D, F, I, J, and K**.

In the past twelve months, we have not sold personal information to third parties. We do not sell personal information (including personal information of consumers under 16 years of age) to third parties.

#### **Right to Opt-Out of the Sale of Personal Information**

California residents have the right to opt-out of the sale of their personal information. Since we do not sell personal information, the ability to opt-out is not applicable.

#### **Right to Know About Personal Information Collected, Disclosed or Sold**

California residents have the right to request that we disclose the categories and specific pieces of personal information we collected, used, disclosed, and sold during the past twelve months; the categories of sources from which their personal information was collected; our business or commercial purposes for collecting their personal information; and the categories of third parties with whom we shared their personal information. You can **submit an online request** or by calling **[NUMBER]**. We will use third party services to verify your identity. You will be required to provide us with first name, last name, address, and date of birth, as well as answer a series of unique identity proofing questions. The personal information that we use to verify your identity will not be used for any other purpose.



## Right to Request Deletion of Personal Information

California residents have the right to request deletion of the personal information we have collected from them or maintained about them. You can **submit a deletion request online** or by calling **[NUMBER]**. We will use third party services to verify your identity. You will be required to provide us with first name, last name, address, and date of birth, as well as answer a series of unique identity proofing questions. The personal information that we use to verify your identity will not be used for any other purpose.

Consumers may designate an authorized agent to make a request on their behalf by submitting the following to **[EMAIL ADDRESS]**: 1) a statement indicating that agent may make CCPA requests on their behalf; and 2) documentation of the consumer/agent relationship (ex. Power of Attorney, Guardianship, Signed Authorization).

For additional information questions or concerns about our privacy policies or practices or if you would like to request that this notice be provided in an alternative format in order to accommodate a disability, please contact us at **[EMAIL ADDRESS]**.

Last updated: May 3, 2024



California residents have certain individual rights related to their personal information. Use this form to make your individual rights request. You may expect a confirmation communication within 10 days of submission. For your protection, the information submitted will be used to verify your identity.

**Request Type \***

- Request to Know - Categories
- Request to Know - Specific Pieces
- Request to Delete

**I am a(n) \***

- Owner
- Annuitant
- Beneficiary
- Other

**First Name \***

**Last Name \***

**Date of Birth \***

**California Resident \***

- Yes
- No

**Mailing Address \***

**City \***

**State \***

**Zip Code \***

**Email**

**Contract Number(s)**

- I am an authorized agent submitting a request on behalf of a consumer.
- I certify, under penalty of perjury, that the provided information is true and correct and that I am the consumer or their authorized agent, whose personal information is the subject of the request.

Continue

\* Required Fields