



PRIVACY CODE

Your privacy matters to Primerica. This Primerica Canada Privacy Code ("**Code**") explains how Primerica collects, uses, discloses, stores and protects personal information in connection with our business and our products and services. It also explains the rights and choices you have about your personal information. In some situations, we may provide additional information at the time your personal information is collected.

By providing your personal information to Primerica, or by authorizing another person or organization to do so on your behalf, you agree to how we handle your information as described in this Code and as permitted by law.

1. Scope and Application

This Code applies to you if you: (a) purchase or use our products or services; (b) access or use any of our websites, mobile applications, emails and other online services that display or link to this Code (collectively, "**Online Services**"); (c) provide, or authorize another person or organization to provide, personal information to us; (d) sign up to receive marketing communications from us; or (e) apply (i) for an employment opportunity with Primerica, or (ii) to be a Representative (as defined below). In this Code, reference to our "**products and services**" or "**products or services**" includes any of our financial products and services, Online Services and ancillary services.

Our Online Services may contain links to websites that are owned and operated by third parties. This Code does not apply to such linked websites, and we encourage you to review the privacy policies applicable to any website you visit.

2. Definitions

Personal information: Information about you. This includes information such as your name, contact details and identifying numbers. Personal information does **not** include: (a) business contact information used to contact you at your workplace; or (b) information that has been anonymized so it can no longer be linked to you.

Primerica / we / our / us: Primerica Financial Services Ltd. and the following affiliated entities: Primerica Financial Services (Canada) Ltd., Primerica Life Insurance Company of Canada, PFSL Investments Canada Ltd., PFSL Fund Management Ltd. and Primerica Client Services Inc.

Representative: An independent contractor sales representative who has signed an independent business application and: (a) is registered as a Dealing Representative (Mutual Fund Dealer) to sell mutual funds for PFSL Investments Canada Ltd.; (b) is licensed as a life insurance agent to sell life insurance products of Primerica Life Insurance Company of Canada; (c) is both registered as a Dealing Representative and holds a life insurance license; or (d) has signed an independent business application without holding a life license or being registered as a Dealing Representative.

3. Your Consent

By providing your personal information, directly or through an authorized third party, you consent to how we collect, use, disclose, and retain it as outlined in this Code and permitted by law.

You may withdraw your consent at any time, subject to legal or contractual restrictions and on reasonable written notice to us, but then you might not be able to proceed with your intended interactions or transactions with us or otherwise receive the full benefit of our products and services. To withdraw your consent, please contact our Privacy Officer using the information in Section 14.

In addition, where permitted by applicable law, we may collect, use, disclose and retain your personal information without your consent.

4. Personal Information We Collect

We only collect personal information that is reasonably necessary for our business purposes. Depending on how you interact with us, we may collect:

- (a) **Identifiers**, such as name, gender, date of birth, address, telephone number, email address, occupation, employer, particulars of employment, assets, income, language preference and government-issued identification, including social insurance number;
- (b) **financial and transaction information**, such as account details, credit information, insurance coverage and payment history;
- (c) **health information** such as medical conditions, diagnosis and treatment and records of physician visits;
- (d) **internet or other electronic network activity information**, such as your IP address, device ID, browser type, language preferences, email bounce backs, click-throughs and general geographic information; and
- (e) **other information you choose to provide**, such as when you contact us by email, by phone or in-person.

5. How We Collect Personal Information

We collect personal information in a variety of ways, including directly from you, from third parties and through our Online Services.

- (a) **Directly From You:** For example, when you apply for or use our products or services, complete forms, respond to surveys or engage with Representatives.
- (b) **Third Parties:** We may collect information from third parties, including employers, credit bureaus, healthcare providers, financial institutions, government bodies and service providers involved in delivering products or services to you.
- (c) **Through our Online Services:** Our Online Services use cookies and other similar technologies to collect information about how users access and interact with our Online Services. Some of these technologies may be operated by third-party service providers. We use this information to understand usage patterns, analyze trends, prevent fraud, undertake debugging, administer and improve the performance of our Online Services and enhance user experience.

You can manage your preferences regarding cookies and similar technologies using the cookie banner on our websites. Most browsers let you remove or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change the settings. Disabling certain cookies may affect the functionality of our Online Services.

The technologies we use may include:

- **Cookies.** Cookies are small text files stored on your computer or mobile device. We use the following types of cookies:
 - **Strictly necessary cookies:** These cookies are necessary for the functioning of the Online Services and cannot be disabled.
 - **Functional cookies:** These cookies allow the Online Services to remember information such as your preferred language. These cookies can also be used to provide you with information specific to your region.
 - **Analytics cookies:** These cookies allow the Online Services to collect information about your interactions, including which pages you visit most often and if certain pages send you error messages.
 - **Web beacons.** The Online Services may contain web beacons (also known as pixel tags or clear gifs) that help us understand usage patterns and measure the effectiveness of content or features.
 - **Web analytics tools.** We use web analytics tools, such as Google Analytics, to collect and analyze information about how users interact with the Online Services. These tools help us monitor and analyze the performance of our Online Services, improve functionality, and conduct auditing, research, reporting, and debugging activities.
 - **Session analytics tools.** We use session analytics tools, such as Dynatrace Session Replay, to better understand how users navigate our websites and where they may encounter technical difficulties. These tools allow us to record and replay user sessions on our websites, helping us analyze how users navigate our websites and where they encounter difficulties.
- Some browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals.

- (d) **Combining personal information:** We may combine your personal information collected by us or on our behalf through the various sources described in this Section 5.

6. How We Use Personal Information

We use your personal information for the following purposes:

- (a) providing, servicing and improving our products and services;
- (b) confirming your identity and eligibility for products and services;
- (c) processing applications, payments and claims;
- (d) responding to inquiries and providing customer support;
- (e) maintaining security and detecting and preventing fraud;
- (f) meeting legal and regulatory requirements, including Canadian federal, provincial and territorial requirements and foreign requirements applicable to us or our service providers;

- (g) assessing your needs and providing you with customized information, offers and promotions regarding our products and services and other products and services that might be of interest to you; and
- (h) transferring your personal information to our service providers (i.e., organizations that provide services to us) to assist us to use your personal information as explained in this Code and as otherwise permitted by applicable law.

Primerica uses automated decision-making systems to support life insurance underwriting decisions.

7. When We Disclose Your Personal Information

We may disclose your personal information:

- (a) to our affiliated entities, other financial institutions, mutual fund companies or credit bureaus for the purposes described in this Code;
- (b) through marketing lists to our affiliated entities or other selected organizations, to allow them to offer you directly their products and services that may be of interest to you;
- (c) in accordance with your additional specific consents;
- (d) as required or authorized by applicable law, including to comply with court orders, warrants, legal processes or regulatory investigations of potential violations of law; or
- (e) in connection with a proposed or actual business transaction (e.g., corporate amalgamation, reorganization, merger or acquisition or the sale or transfer of some or all of our business or assets).

8. Service Providers

Primerica may enter into contracts with service providers. Your personal information may be transferred to our service providers to help us: (a) provide our products and services; (b) conduct insurance underwriting and related functions; (c) maintain our information technology systems and services; (d) operate our websites; (e) process payments and complete transactions; (f) create, print and deliver emails and documents; (g) detect and deter fraud, money laundering or other criminal activity; (h) provide customer care; (i) collect and analyze data; (j) meet our legal, regulatory and compliance obligations; (k) market or promote our products and services; (l) carry out debt collection activities; or (m) conduct research, studies and surveys.

Service providers are prohibited from using your personal information outside of the contracted purposes. If you have questions about our use of service providers or wish to obtain more information about our policies and practices relating to service providers, please contact our Privacy Officer using the information in Section 14.

9. Where Your Personal Information is Stored or Processed

We and our service providers may store or process personal information outside of the province, territory or country where you live, including in Canada and the United States. As a result, your personal information may be subject to the laws of foreign jurisdictions, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

10. Accessing and Correcting Your Personal Information

You may request access to your personal information and ask that it be corrected if it is inaccurate or incomplete. Requests must be made in writing to our Privacy Officer. We may charge a reasonable fee, as permitted by law, and may decline requests in limited circumstances permitted by law.

11. How We Protect Your Personal Information

We use administrative, technical and physical safeguards designed to protect personal information. Depending on the volume and sensitivity of the information, the purposes for which it is used and the format in which it is stored, we implement a combination of safeguards, including access controls, encryption, security monitoring and employee training. Our goal is to prevent unauthorized access, loss, misuse, sharing or alteration of personal information in our possession.

12. How Long We Keep Personal Information

We keep personal information for only as long as necessary to achieve the purposes for which it was collected, comply with our legal obligations and enforce or protect our legal rights, or for a longer period as required or permitted by applicable law.

13. Changes to This Privacy Code

We may update this Code from time to time. The current version will always be posted on our websites, along with the effective date.

14. Contact Us

If you have questions, concerns or requests about your personal information or this Code, please contact our Privacy Officer:

Privacy Officer
Primerica Canada
6985 Financial Drive, Suite 400
Mississauga, Ontario, L5N 0G3
Tel: 1-800-387-7876
[Email: PrivacyOfficeCanada@primerica.com](mailto:PrivacyOfficeCanada@primerica.com)