

<b>FACTS</b>	<b>WHAT DOES TRANSAMERICA FINANCIAL ADVISORS, LLC (“TFA”) DO WITH YOUR PERSONAL INFORMATION</b>	
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information may include:	
	<ul style="list-style-type: none"> <li>Information identifying you such as your name, date of birth</li> <li>Contact information such as address, phone number, email</li> <li>Government ID, such as Social Security number, or other tax identification, driver's license, passport</li> </ul>	<ul style="list-style-type: none"> <li>Account balances and account transactions</li> <li>Credit and financial information such as income, assets and investment experience</li> <li>Medical or health data</li> <li>Other general information such as your, gender, marital status, nationality, military status</li> </ul>
	When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.	
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons TFA chooses to share; and whether you can limit this sharing.	

Reasons we can share your personal information	Does TFA share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

<b>Questions?</b>	Go to <a href="http://www.tfaconnect.com">www.tfaconnect.com</a>
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<b>Who are we</b>	
Who is providing this notice?	Transamerica Financial Advisors, LLC

Rev. April 2024

What we do	
<b>How does TFA protect my personal information?</b>	We maintain appropriate controls designed to limit access to data to persons who need access to it. These persons access your data so that they can do their jobs or provide products and services to you. We train our workforce to properly handle data. In addition, we maintain other physical, technical, and administrative or procedural safeguards designed to protect your data. Of course, despite these measures, no network or system is entirely secure, and we cannot guarantee the security of networks and systems we operate or that are operated on our behalf.
<b>How does TFA collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• Open an account or enter into an investment advisory agreement</li> <li>• Make deposits or withdrawals from your account or provide account information</li> <li>• Seek advice about your investments</li> <li>• Tell us about your investment or retirement portfolio</li> </ul> We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
Definitions	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Our affiliates include companies with a "Transamerica," or "World Financial Group" name; including companies such as Transamerica Capital, Inc; Transamerica Life Insurance Company; Transamerica Financial Life Insurance Company; Transamerica Retirement Advisors, LLC; Transamerica Retirement Solutions, LLC; World Financial Group, Inc.; and World Financial Group Insurance Agency, LLC (d/b/a in CA World Financial Insurance Agency, LLC).</i></li> </ul>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• TFA does not share with nonaffiliates so they can market to you.</li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• Our joint marketing partners include financial institutions and credit unions.</li> </ul>
Other important information	
This notice replaces all previous notices of our consumer privacy notice, and may be amended at any time.	
If you close your account and transfer your investments to another firm, in the process of transferring we may share your information with the new firm. When you or your representative associates with a new firm, the use of your information becomes subject to the new firm's privacy notice. If you do not want us to share your information (other than as permitted by law) with the representative or the new firm, you may contact us by calling: (727) 299-1476. If your primary address is in a state that requires your affirmative consent to share your information with a new firm, then we will require you give such consent.	
If any of your accounts with us have a Vermont mailing address, we will automatically treat those accounts as if you elected not to share information about your creditworthiness and not to receive marketing from our affiliates; we will also not obtain consumer credit reports about you without your consent. If any of your accounts with us have a California, North Dakota, or Vermont mailing address, we will automatically not include those accounts in any joint marketing activities with nonaffiliated financial companies.	

**CALIFORNIA CONSUMER PRIVACY ACT NOTICE**

At Transamerica, it is important to us that you understand how we use and share your personal information. This California Consumer Privacy Act (“CCPA”) notice (“Notice”) outlines our use and disclosure of personal information pertaining to residents of California that is covered by the CCPA. This Notice applies to users of the websites and mobile applications of the Transamerica companies (collectively “Transamerica”, “we”, “us” or “our”) (for a list of companies, please see our Online Privacy Notice or Contact Us as set forth below) and to our customers.

This Notice supplements the Online Privacy Notice with respect to personal information of California residents that is covered by the CCPA. The CCPA does not apply to: (i) personal information that is subject to the federal Gramm-Leach-Bliley Act (“GLBA”); or (ii) health information subject to the federal Health Insurance Portability and Accountability Act (“HIPAA”). For example, this Notice is not applicable to policyholders or individual customers who have or are using our financial or health products and services primarily for personal, family or household use. If the foregoing applies to you, federal law requires that we provide you with a separate privacy notice. Such notices can be viewed at [www.transamerica.com/privacy-policy](http://www.transamerica.com/privacy-policy) (“**Online Privacy Notice**,” see “**Additional Privacy Notices**”).

This Notice identifies the categories of personal information we collect, describes how we use and share personal information, and explains how California residents can make certain requests regarding their personal information.

**Categories of Personal Information Collected**

The categories of personal information we collect about you depend on what you share with us, the product(s) you have purchased from us, and the service(s) you receive from us. Below, we describe the categories of personal information we have collected in the last 12 months and how we disclose personal information to third parties:

- *Identifiers* such as name, postal address, date of birth, email address, social security number, driver’s license number, passport number, or other information that identifies you
- *Demographic and other information* considered to be protected classifications under federal or California law, such as age, race, disability, criminal history, marital status, or medical condition
- *Customer records*, which includes personal information as defined in the California customer records law, such as signature; insurance or other policy number; financial information, including as submitted by you related to your specific financial condition, accounts, or assets, or which relate to a product sold, serviced, or issued by us; and health, prescription, or medical information you have provided to us or authorized us to access
- *Commercial information*, such as transaction information and purchase history, and information relating to your business and property interests
- *Biometric information* such as voiceprints
- *Internet or network activity information*, such as search and browsing history, login credentials, IP address, and device and advertising identifiers
- *Geolocation data*
- *Audio information* such as a voice recording
- *Professional or employment-related information*, such as past and present work history, affiliations, education, and employment
- *Inferences* which we may generate or acquire relating to your preferences, attitudes, characteristics, or behaviors
- *Sensitive Information*, including:
  - social security, driver’s license, state identification card, or passport number
  - your account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account
  - racial or ethnic origin, religious or philosophical beliefs, or union membership
  - biometric information, if you elect to use your voiceprint as a security credential
  - personal information collected and analyzed concerning a consumer’s health

**Sources from Which Personal Information is Collected**

We collect these categories of personal information from a variety of sources, including yourself and other sources authorized by you either on this Site or via processing/servicing a product or an application for a product, for example, from your doctor, financial advisor, or credit reporting agency, or other sources needed to underwrite or issue a product or complete a transaction. We also obtain personal information from public records and other widely available sources, and in some cases from companies that assist us with fraud prevention, underwriting and similar services. Internet information may be collected from devices you use to access our websites, mobile applications, and services (including through cookies and similar technologies). Inferences and other categories of personal information may be collected from third parties such as social media providers, advertising networks, marketing and analytics providers, and data brokers. More details may be found in our Online Privacy Statement (see “**Information We Collect**”).

**Business or Commercial Purposes of Use of Personal Information**

We may use personal information for business or commercial purposes including: i) evaluating eligibility for products or services; ii) administering our products, providing services, and delivering content; iii) product pricing, development, and quality assurance; iv) actuarial and research studies, and other technological development and analytics; v) legal and regulatory filings, auditing, and compliance; vi) identity verification, fraud prevention, and information security; vii) supporting, debugging, and maintaining information systems; viii) marketing, advertising, promotions, and sales; and, ix) other operational purposes compatible with the uses related to your initial disclosure. More details may be found in our Online Privacy Statement (see “**How We Use the Information We Collect**”).

**Notice of Monitoring of Services**

See the Online Privacy Statement for a description of how we may monitor visits to our websites and mobile applications, including sessions of users.

**To Which Categories of Third Parties is Personal Information Disclosed or “Sold”?**

We disclose and have disclosed within the twelve months preceding the Revised Date of this Notice information included under each of the categories listed above to affiliates, to service providers, as authorized by you, and as required or permitted by law. This includes: companies who help us process claims, maintain accounts, and support marketing and sales; credit bureaus; insurance regulators, law enforcement, government authorities and third parties in response to legal processes or to determine eligibility for public benefits; health care professionals (e.g., to verify coverage or provide information relating to a medical condition); other insurance companies (including successor insurers), agents

and insurance support organizations to coordinate benefits or in connection with insurance transactions involving you; group policyholders (e.g., regarding claims experience, benefits administration or service audits); certificate or policyholders (e.g., regarding the status of an insurance transaction); those with a legal or beneficial interest in your assets (e.g., a creditor); employer or plan sponsor (e.g., to support administration of employee accounts as permitted by law); your representatives and lawyers; to prevent or prosecute fraud or crime; to researchers or professional advisers (such as for actuarial or research studies); and to a purchaser, underwriter, or others in connection with the sale or merger of all or part of our business. While we do not currently “sell” or “share” (as such terms are defined under California law) personal information subject to the CCPA, and have not “sold” or “shared” personal information subject to the CCPA in the twelve months preceding the Revised Date of this Notice, we offer you the right to opt-out, as described in the “**Your California Consumer Privacy Rights**” section below.

#### **Sales or Sharing of Minors’ Personal Information**

We do not sell personal information of individuals we know to be under the age of 16, nor do we share such personal information with third parties for cross-context behavioral advertising.

#### **How Long We Keep Personal Information**

The amount of time we retain a particular category of personal information will vary depending on the purpose for which it was collected, our business need for it, and our legal obligations to retain it. We retain your personal information for the time needed to fulfill the purpose for which that information was collected and as required pursuant to our data retention policies, which reflect applicable statute of limitation periods and legal requirements. To determine the appropriate retention period for personal information, we consider the nature and sensitivity of your personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we collect, use and maintain your personal information and our legal requirements to retain such information.

#### **Your California Consumer Privacy Rights**

As a California resident, you have certain rights to make requests regarding your personal information (“Consumer Requests”):

- 1) Right to Know: You have the right to request that we disclose what personal information we collect, use, disclose, and sell, including: i) specific pieces of information that we have collected about you; ii) categories of personal information we have collected about you; iii) categories of sources from which the personal information is collected; iv) categories of personal information about you that we sold or disclosed for a business purpose; v) categories of third parties to whom the personal information was sold or disclosed for a business purpose; and vi) the business or commercial purpose for collecting, selling or sharing personal information. Please note that Transamerica is not obligated to respond to a California resident’s Request to Know more than twice in any 12-month period. Because the information you’re requesting is sensitive, prior to sending you your personal information report we will need to verify your identity as noted below.
- 2) Right to Correct: You have the right to request that we correct inaccurate personal information that we maintain about you.
- 3) Right to Delete: You have the right to request that we delete personal information we have collected about you, subject to Transamerica’s legal rights or obligations to retain such personal information (for example, we have a legal obligation to retain information regarding your account while your account is active and for at least seven years thereafter, we are required to retain a record of your deletion request, we may retain data in archive systems, etc.). Please note that once we delete your information, we cannot restore it.

4) Right to Opt-Out of Sales/Sharing: You have the right to opt out of sales of your personal information or the disclosure of your personal information for cross-context behavioral advertising (“sharing”). Cross-context behavioral advertising refers to the targeting of advertising to an individual based on the individual’s personal information obtained from their activity across businesses, websites, or applications other than those provided by Transamerica. While we currently do not sell or share your personal information, if we do so in the future, we will honor your opt-out election. As of the effective date above, we do not respond to Do Not Track signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party websites.

- You can make a Consumer Request via our online forms found at [www.transamerica.com/ccpa-disclosure](http://www.transamerica.com/ccpa-disclosure) or by calling Transamerica, toll-free, at 877-247-2401.
- Transamerica collects certain sensitive information (as discussed above in the “**Categories of Personal Information Collected**” section). We do not use or disclose sensitive information in a manner that requires us to offer a right to limit such use under the CCPA.
- Transamerica does not use automated decision-making tools to process your personal information in a manner that requires us to offer a right to limit such processing under the CCPA.
- Transamerica publishes its response metrics related to Consumer Requests at [www.transamerica.com/CCPA-metrics](http://www.transamerica.com/CCPA-metrics).
- We may limit our response to your rights as permitted by applicable law.

#### **Verification Process & Authorized Agents**

Upon receipt of a Consumer Request, we will seek to verify your identity to our reasonable satisfaction before responding. This may require you to submit personal information to us during the verification process. You may authorize another individual to submit a Consumer Request on your behalf through the means indicated above. We may require the authorized agent to provide proof of your signed permission to submit the request and may require you to do one of the following: i) verify your identity directly with us; or ii) directly confirm to us that you have provided the authorized agent permission to submit the request.

#### **Non-Discrimination**

You have the right to be free from unlawful discrimination for exercising your privacy rights under the CCPA. In response to your exercise of your rights, we may not: i) deny goods or services; ii) charge different prices or rates for goods or services, including through discounts or other benefits, or imposing penalties; iii) provide a different level of quality of goods or services; or iv) suggest that you will receive a different price or rate for goods or services, or a different level or quality of goods or services. We may, however, charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by your personal information.

#### **Contact Us**

If you have questions or any concerns, please call our toll-free number: 877-247-2401 or reach out to us via email: [consumerdatarequest@transamerica.com](mailto:consumerdatarequest@transamerica.com).