

THE COLORADO BANKERS LIFE INSURANCE COMPANIES' PRIVACY POLICY

Effective Date: April 7, 2022

Last Updated: February 27, 2023

INTRODUCTION

The Colorado Bankers Life Insurance Company® (Colorado Bankers Life," "we", "us" or "our") is committed to your rights to privacy.

This Privacy Policy ("**Privacy Policy**") describes the types of information we may collect from you or that you may provide in the course of our business, including when you visit the website <https://cblife.com/> (our "**Site**"), and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies to information we collect (1) on this Site; (2) in email and other electronic messages between you and this Site and (3) when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy (collectively, "**Visitor Data**").

It does not apply to information collected by (1) us offline or through any other means, including on any other website operated by Colorado Bankers Life or any third party (including our affiliates and subsidiaries); or (2) any third party (including our affiliates), including through any application or content (including advertising) that may link to or be accessible from the Site. We recommend that you review the practices published for any other Internet sites you may visit.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using this Site, you agree that your information will be handled as described in this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates.

COLLECTION OF YOUR INFORMATION

Information You Voluntarily Provide to Us

In visiting our Site or conducting business with us, you may voluntarily submit personal data directly to us for several reasons, such as registering an account with our Site, interest in learning more about our products and services and requesting additional information.

In contacting us, you may submit your name, address, telephone number, and email address. Through our product and service applications, we may request information including, but not limited to, your name, e-mail address, date of birth, phone number, postal address, social security number, driver's license, and financial information, which is collected for the purpose of evaluating creditworthiness. That information or combination of data or more sensitive information may be used to identify you (together, "**Personal Data**"). Most of the Personal Data we receive from you is publicly available, but it will be protected as set forth below.

We collect the following categories of Personal Data:

PERSONAL DATA CATEGORIES	EXAMPLES
Personal Identifiers	Name, alias, signature, postal address, phone number, date of birth, unique personal identifier, online identifier, email address, internet protocol (IP) address, state identification card number, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
Personal Characteristics	Age, race, ancestry, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information) and other descriptions of your physical characteristics (e.g., height).
Commercial Information	Service or product related information including policy coverage information, premiums, account name, policy number, payment history, claims history, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, account log-in, bank account number, credit or debit card number, other payment or financial information, credit information, medical history, or family member information.
Internet or Other Electronic Network Activity Information	Browsing history, search history, information regarding your interaction with our website, application or advertisement, links you use or web pages you visit while visiting our site or applications, browser type, internet service provider (ISP), cookies, and mobile device information including device identifier or other information.
Sensitive Personal Data	Some Personal Data we collect is defined under the law as sensitive personal information. Sensitive personal information

PERSONAL DATA CATEGORIES	EXAMPLES
	we collect includes Social Security number, driver's license number, state identification card number, passport number, customer account log-in, financial account number, debit card number, and credit card number in combination with any required security or access code, password, or credentials allowing access to an account.

You can visit us on our Site without sharing information about yourself. We do not collect your Personal Data unless you willingly provide it to us. You may choose not to provide us with Personal Data by not communicating that information to us. However, you may be unable to access certain services and features if those services and features require Personal Data to function. In general, some Personal Data about you is required for you to use our services.

If you have Personal Data or confidential information to relay to our company that you do not want to relay over the internet or via email, you may do so by postal mail at the address given below, or you may call our Customer Service team at 1-833-658-2841.

Colorado Bankers Life Insurance Company
c/o Noble Consulting Services, Inc.
211 N. Pennsylvania Street, Suite 2350
Indianapolis, IN 46204

Information We Collect

When accessing our Site, Colorado Bankers Life will learn other information about you during your visit.

To administer our systems and Site and make improvements to them, we may record non-personal information about your Site access, such as the internet protocol (IP) address and associated domain name sever (DNS), websites visited before and after visiting the Site, and the browser software you are using to access the Site.

Similar to other commercial websites, our Site utilizes a standard technology called "cookies" and web server logs to collect information about how our Site is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website, the websites visited just before and just after our website, and your IP address. This is discussed more in the "Information We Collect Through Automatic Data Collection Technologies and Cookies" section.

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections

for these electronic communications that we employ in the maintenance of information received online, mail and telephone.

HOW WE USE YOUR INFORMATION

We use the Personal Data you provide to:

- (1) present our Site and its contents to you;
- (2) provide you with our products or services;
- (3) deliver you personalized content and product offerings;
- (4) establish, manage, and terminate business relations with you;
- (5) in any other way we may describe when you provide the information;
- (6) for any other purpose with your consent; or
- (7) as required for legal compliance or other lawful purposes.

Your Personal Data may also be used to communicate with you by e-mail or telephone and send you marketing materials if you choose to opt-in to such campaigns, of which you may opt-out of at any time.

Colorado Bankers Life seeks your consent before contacting you via telephone and email.

Telephone

By contacting Colorado Bankers Life via telephone you are authorizing Colorado Bankers Life and/or its service providers to contact you at the number you provided to Colorado Bankers Life via telephone regarding your business with us. We acknowledge that this consent may be revoked at any time, but that until such consent is revoked, you may receive calls from Colorado Bankers Life.

Email

Specifically, by providing your contact information or by clicking the box labeled “Create” where you provide your first name, last name, and email address when registering for an account on our Site, you are authorizing Colorado Bankers Life and/or its service providers to contact you via email. We may collect and send you email for the following purposes but will always accurately identify ourselves and use truthful and accurate subjects and information.

- Send general information and answer questions and queries.
- Provide product and service updates and information.
- Engage in marketing activities.
- Determine collaboration or partnership interest/opportunities of mutual interest.

We have provided an “Unsubscribe” link at the bottom of any such email or communication and will promptly fulfill your request to opt-out/unsubscribe to these communications.

INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION

TECHNOLOGIES AND COOKIES

When using our Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- (1) Details of your visits to our Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site.
- (2) Information about your computer and internet connection, including your IP address, operating system, and browser type.

The technologies we use for this automatic data collection may include cookies (or browser cookies), flash cookies, or web beacons. A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that website's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Cookies enable the website or service providers systems to recognize your browser and capture and remember certain information.

You do not need to have the ability to accept cookies turned on in your browser to visit our Site. You can optionally refuse cookies by setting your browser (1) to decline them automatically or (2) to give you the choice of declining or accepting the placement of cookies from the Site.

WEBSITE ANALYTICS

We may partner with third-party vendors such as Google Analytics, and others, to understand visitor traffic and navigation preferences for Colorado Bankers Life's Site. By visiting our Site you consent to the collection and use of information by these third-party vendors. We do not transfer Personal Data to these third-party vendors. You may opt out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout>.

THIRD PARTIES AND INFORMATION WE SHARE

Other than as set forth in this Privacy Policy, Colorado Bankers Life will not obtain Personal Data about you when you visit our Site, unless you choose to provide such information to us, nor will such information be sold or otherwise transferred to unaffiliated third parties without the approval of the user at the time of collection.

We may disclose your Personal Data when legally compelled to do so, in other words, when we, in good faith, believe that the law requires it or for the protection of our legal rights. We may also link to other websites which are controlled by third parties. These third-party websites are not under Colorado Bankers Life's control. Thus, once you have clicked these links and are on the third-party websites, you and your data are subject to the privacy notices or privacy policies of the third parties and not Colorado Bankers Life. Once navigating away from

Colorado Bankers Life's Site, we recommend you take the opportunity to familiarize yourself with your rights under any third-party privacy notice. In the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of Colorado Bankers Life's assets, you acknowledge that your Personal Data may be among the assets transferred. You acknowledge that such transfers may occur, and that any acquirer may continue to process your Personal Data as noted in this Privacy Policy.

Additionally, third party vendors may help us administer our Site, communicate with you or others, comply with regulations, or deliver services. We may share your data with them in support of any of these goals. However, prior to doing so, we obtain assurances from our vendors that they will safeguard your Personal Data.

HOW LONG WE KEEP YOUR INFORMATION

We retain your Personal Data for as long as necessary to fulfill the purposes for which it was collected, to fulfill a business or commercial purpose as explained in this Privacy Policy, and in accordance with applicable laws or regulatory requirements.

YOUR CHOICES, ACCESS, CORRECTION, AND DELETION

To process your Personal Data, we typically rely upon your consent, contract performance, our legitimate business interest, or compliance with law. You may object to or restrict our processing of your Personal Data. You may withdraw any prior consent you may have given to process Personal Data at any time.

Should you wish to access or amend any Personal Data you may have provided us or if you wish to request deletion, please contact us at ncrehab@noblecon.net. Your Personal Data will be deleted or blocked from our database at your request.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

HOW WE PROTECT YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your Personal Data. While we have taken reasonable steps to secure the Personal Data you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable. We also use encryption on certain areas of our website, and on other areas, we do not use encryption. As such, Colorado Bankers Life cannot and does not warrant the security of your Personal Data.

Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk. Please use your best judgment when sending confidential and/or Personal Data via the internet or email. An email may be copied, altered, or destroyed. Some networks may use a secure website to protect your privacy, while others may not.

Some of the information you may enter on our Site may be transmitted securely via a secure medium known as Secure Sockets Layer, or SSL. Credit card information should never be transmitted via email.

RIGHTS OF CERTAIN TYPES OF USERS

Subject to local law, you may have certain rights with regard to your Personal Data. These rights may include the following rights to (1) know more about, access, and/or obtain a portable version of your Personal Data (2) rectify your Personal Data or request its deletion, (3) request a restriction on the processing of your Personal Data, (4) opt-out of the sharing of your Personal Data, or (5) exercise other rights with respect to your Personal Data.

To learn more about the Personal Data we collect about you or the rights you may have, please contact us at ncrehab@noblecon.net or 1-833-658-2841. While we strongly encourage you to first raise any questions or concerns about your Personal Data directly with us, you may have a right to lodge a complaint with the relevant supervisory authority.

EUROPEAN ECONOMIC AREA/EUROPEAN UNION (EU)

Colorado Bankers Life's headquarters and offices are in the United States and we do not intentionally target European visitors to our website and do not receive EU Personal Data directly from individuals. For any Personal Data submitted via the Site, we take the protections listed above that comply with the EU General Data Protection Regulation **2016/679/EU** ("GDPR") regarding the collection, use, and retention of Personal Data from the EU member countries and Switzerland.

CALIFORNIA

This section addresses our privacy practices governed by the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively the "CCPA") with respect to Personal Data we collect or obtain about California residents who are covered by the CCPA.

We maintain administrative, technical and physical safeguards designed to protect Personal Data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

This section applies to you if you are a California resident who has not obtained or sought to obtain a product or service from Colorado Bankers Life. This section also applies to you if you are a California resident who has applied for a position with, or been recruited by, Colorado Bankers Life.

If you do not fall within the categories described above and are a customer of Colorado Bankers Life, an insured or beneficiary under a policy, or have sought to obtain a product or service from Colorado Bankers Life, our Privacy Policy applies to you.

When you visit any part of our Site, our Privacy Policy applies.

Sources and Categories of Personal Data We Collect

When you visit our Site, we may collect Personal Data directly from you. The categories of Personal Data we may collect from you when you visit our Sites are described in the **“COLLECTION OF YOUR INFORMATION”** section of our Privacy Policy.

We may also collect Personal Data directly from you and from other sources through offline means. This includes contact information (such as name, postal address, email address and telephone number), resume information (such as education, professional or employment-related information), commercial information, publicly available information and demographic information, from public sources and third parties (such as data aggregators) who help facilitate our marketing, analytics and recruiting efforts. When appropriate, we may use some of this information to draw inferences about your preferences, so we can better tailor our marketing, advertising and recruiting efforts.

Business or Commercial Purposes for Collecting Personal Data

We use the Personal Data you provide to us through our Sites for various business or commercial purposes. The purposes for which we use this personal information are described in the **“HOW WE USE YOUR INFORMATION”** section of our Privacy Policy.

We use the Personal Data we collect about you through offline means to: provide you information about our products and services; conduct marketing and advertising; perform market research; perform data analytics; help enhance or improve our products and services; manage our recruiting efforts and career opportunities; prevent fraud; and perform IT and administrative support functions.

Categories of Third Parties with Whom We Share Personal Data

Colorado Bankers Life does not sell your Personal Data (including the Personal Data of minors under the age of 16).

We may disclose your Personal Data to our subsidiaries and affiliates, and service providers, so we can provide you information about our products and services, as well as perform various business functions, such as data analytics, marketing and advertising, market research, mailings, recruiting and hiring, fraud prevention, and other IT and administrative support functions. The Personal Data disclosed to them may include your contact information (such as name, postal address, email address and telephone number), and demographic information. We do not authorize our service providers to use or disclose the information except as necessary to perform services or functions on our behalf, or to comply with legal requirements.

We also may share Personal Data with third parties (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies,

such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Rights Under the CCPA and How to Exercise Them

If you are a California resident whose personal information is covered by the CCPA and this section, you may have certain rights under the CCPA as listed below. We will comply with your request in accordance with, and to the extent permissible under, applicable law.

Access

You have the right to request that we disclose to you the following information about the last 12 months:

1. The categories and specific pieces of personal information we have collected about you;
2. The categories of sources from which your personal information was collected;
3. The business or commercial purpose for collecting or selling your personal information (we do not sell your personal information); and
4. The categories of third parties with whom we have shared your personal information.

Deletion

You have the right to request that we and our service providers delete any personal information which we have collected from you. We and our service providers will not delete your personal information if it is necessary or permissible for us or our service providers to maintain the personal information pursuant to the CCPA or other applicable law.

Information About Our Sharing of Personal Data

You have the right to request that we disclose to you the following information about the last 12 months:

1. Whether we have sold your Personal Data (please note that we do not sell your personal information); and
2. The categories of Personal Data we have disclosed about you for a business purpose and the categories of third parties to whom the Personal Data was disclosed.
3. You can exercise your rights listed above, or reach out to us with questions or concerns about our privacy policies and practices, by calling us at 1-833-658-2841 or by emailing us at ncrehab@noblecon.net. Note that, pursuant to the CCPA, you will not receive discriminatory treatment from us if you choose to exercise any of your CCPA rights.

When you submit a CCPA request, we will ask you to provide certain verification information, such as your name, phone number, postal address, email address, and date of birth. This information will be used to help us detect potential fraud, verify your identity, and fulfill and respond to your request. Upon receiving a CCPA request, we will call you using the phone number you provide to request your Social Security Number to further verify your identity and answer a few authentication questions required by the third-party identity verification service we use to assist in this process. We will not store or use this information for any other purpose.

If you decide to designate an authorized agent (other than through power of attorney) to submit a CCPA request on your behalf, we require that you provide the authorized agent written permission to do so and verify your own identity through the process described in the paragraph above. We also require the authorized agent to submit proof that you have authorized them to act on your behalf.

California's "Shine the Light" law (Civil Code Section § 1798.83) is not applicable to our Site as Colorado Bankers Life does not disclose any personal information to third parties for direct marketing purposes.

RIGHTS OF NEVADA RESIDENTS

If you are a Nevada consumer, you have the right to request that a company not sell your Personal Data for monetary consideration to certain other parties. This right applies even if your Personal Data is not currently being sold. Further, if you do not want to receive sales calls from us, you may request to be placed on our internal "do not call" list. If you are a Nevada consumer and wish to exercise your rights under Nevada law, please contact us at ncrehab@noblecon.net.

RIGHTS OF VIRGINIA, COLORADO, CONNECTICUT, AND UTAH RESIDENTS

As a Virginia, Colorado, Connecticut, or Utah consumer, you have certain rights regarding the Personal Data that we collect and share including:

- To know more about, access, and obtain a portable version of your Personal Data;
- To opt-out of the processing of your Personal Data for targeted advertising, the sale of your Personal Data, and certain types of profiling;
- That we correct your Personal Data that is inaccurate; and
- That we delete your Personal Data.

If you would like to exercise any of these rights, please contact us at ncrehab@noblecon.net. We may need to verify your identity before processing your request. Please note that some of these rights may be limited in certain circumstances, as required by law. Colorado Bankers Life will not discriminate against you for exercising your privacy rights under the law. Colorado Bankers Life is committed to respecting your privacy and protecting your personal information. If you have any questions or concerns, please don't hesitate to reach out to us.

RIGHTS OF VERMONT RESIDENTS

Colorado Bankers Life will not share your Personal Data for marketing purposes except as allowed by Vermont law.

MINORS

Colorado Bankers Life's Site is not intended for children under 16 years of age, nor do we knowingly market or sell any goods or services to persons under the age of 18. Accordingly, we do not knowingly process Personal Data from anyone under 18 years of age and anyone under 18 years of age should not submit any Personal Data to Colorado Bankers Life. If you believe that we have collected personal information from a child under 16 without parental consent, please contact us at ncrehab@noblecon.net and we will take steps to remove that information promptly.

REQUESTS, RECOURSE, ENFORCEMENT, AND LIABILITY

Complaints and issues escalated to Colorado Bankers Life will be responded to promptly, especially with regard to any data breach, but in any event within 30 days of receipt. Colorado Bankers Life will investigate any complaints and issues, attempting to promote expedited resolution. To escalate any issue or complaint, please contact Colorado Bankers Life at ncrehab@noblecon.net or 1-833-658-2841.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to change or update this Privacy Policy, our Site, and all the representations and information in it. Our representations in this Privacy Policy do not create any contractual or legal rights by another party against us. Users of this site must accept that we have no liability, except to the extent mandated by law, with respect to any actions taken as a result of or in connection with viewing any information contained on the Site.

However, please be assured that if the Privacy Policy changes in the future, we will not use the personal information you have submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy, without your prior consent. If you have any questions regarding this Policy, or your dealings with our Site, please contact us at ncrehab@noblecon.net.

All service-marked, trade-marked and registered items are our sole and exclusive property unless otherwise noted. All rights are reserved. Downloads, copies, or mirrors of this site are forbidden without our prior written consent.