

Sun Life Assurance Company of Canada

Privacy Policy and Notice for California Residents
Sun Life Employees and Employee Applicants



This Privacy Policy and Notice applies to personal information of California residents who are Sun Life employees or Sun Life employee applicants. It applies to the extent the information is subject to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020.

Your privacy is important to Sun Life. We are committed to maintaining the privacy and security of your personal information. You can read further about how we respect your privacy at www.sunlife.com/us. Click on the privacy link at the bottom of that page to learn more.

Personal information we may collect

In the past 12 months and in the future, Sun Life may collect the following categories of your personal information:

Category of Personal Information	Examples of Personal Information
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, or other similar identifiers.
Personal information categories listed in the California Customer Records statute	A 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, or any other financial, medical, or health insurance information. *Some personal information included in this category may overlap with other categories.
Characteristics of protected classifications under California or federal law	Race, color, age (40 years and older), ancestry, national origin, citizenship, religion or creed, 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.
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Personal information we collect or may otherwise receive in the course of employment, continued

Category of Personal Information	Examples of Personal Information Collected
Biometric information	Physiological, biological or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA), imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, voice recordings, gait patterns or rhythms, and sleep, health, or exercise information.
Internet or other electronic network activity information	Information regarding a consumer's interaction with our Internet Web sites, applications, or advertisements.
Geolocation data	Physical location and/or movements determined by means of digital information processed via the Internet.
Sensory data	Audio, electronic, visual, thermal, or similar information.
Professional or employment-related information	Current and/or past employment history including performance evaluations.
Non-public education information (as defined in the Family Educational Rights and Privacy Act)	Education records, files, documents, and other materials directly related to a student maintained by an educational agency or institution or by a person acting for such an agency or institution, such as grades, transcripts, or student disciplinary records.
Inferences drawn from other personal information	Information used to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

The personal information that we collect about you may include sensitive personal information. Sensitive personal information is a type of personal information that reveals certain data elements. The categories of sensitive personal information we may collect include:

- social security, driver's license, state identification card, or passport number
- 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
- precise geolocation
- racial or ethnic origin, religious or philosophical beliefs, union membership
- mail, email, and text messages
- health information
- sex life or sexual orientation

Sources of personal information

We get your personal information, including sensitive personal information, from one or more of these categories of sources:

- Directly from you
- Benefits administrators
- Service providers, including affiliates
- Our website and related applications
- Other third parties (these may include, but are not limited to, third party administrators, healthcare providers, authorized representatives, vendors, social media sites, consumer reporting agencies, your family members, and regulatory agencies)

Uses of personal information

We may use the above categories of personal information for these business purposes:

- To create and maintain employment or applicant records, including but not limited to employee/applicant identification.
- For payroll processing and/or benefits administration, including but not limited to claims for family or medical leave
- To enroll employees in benefits
- To respond to employee or applicant inquiries, provide customer support, or for other communications with employees and applicants
- For employee or applicant recruitment
- For responding to requests for accommodation in the workplace
- For other internal business purposes, including but not limited to audit, risk management, security, and quality control purposes
- To obtain reinsurance
- To comply with federal, state or local laws, respond to a subpoena, or comply with an inquiry by a governmental agency or regulator
- For any other legally permissible purpose related to your employment or application for employment

We may use your sensitive personal information for these purposes:

- To provide you products or services that you have requested
- To ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes
- Short-term, transient use, including but not limited to non-personalized advertising shown as part of your current interaction with us
- Maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, and processing payments. Also, providing financing, analytic services, storage, or similar services on our behalf.
- Undertaking activities to verify or maintain the quality or safety of a service or device that we own, control, manufacture, or have manufactured for us. This also includes activities to improve, upgrade, or enhance the service or device that we own, control, manufacture, or have manufactured for us

We do not use your sensitive personal information for reasons other than those listed above.

Once we obtain your personal information, we do not further disclose it except as permitted or required by law. We may share your information within Sun Life when using your personal and sensitive personal information.

Third parties with whom personal information is disclosed

In the past 12 months and in the future, Sun Life may disclose the above categories of your personal information and sensitive personal information within the Sun Life group of companies, as well as to the following categories of third parties:

- Service providers that help us conduct our business and perform services on our behalf
- Benefits administrators
- Reinsurers
- Government agencies, regulatory authorities and other third parties as required by law
- You and your authorized representative(s)

The information we disclose may include patient information that has been de-identified according to the [HIPAA safe harbor method](#). If we disclose your information to third parties, we require them to protect the privacy of your information. We permit them to use and disclose your information only for the purpose(s) for which we provided it.

Retention of personal information

The type of record or other information involved may affect how long we retain your personal information, including sensitive personal information. We retain your personal information and sensitive personal information for as long as it is needed for the purposes for which we collect it. We may need to retain your personal information and sensitive personal information for longer in order to meet applicable legal, regulatory, business, or contractual requirements.

Sale or sharing of your personal information

Sun Life **does not sell** your personal information or sensitive personal information. We also do not share it with third parties that target advertising to you based on your activity on the websites, applications, or services of other businesses. We similarly do not knowingly sell or share the personal information of consumers under 16 years of age.

Your privacy rights

How to exercise your rights and/or obtain further information

You can submit a request to access, correct, or delete your personal information in any of the following ways.

1. Call 1-888-668-8277
2. Email hr.services.rh@sunlife.com
3. Fill out a California individual rights request webform
 - Go to <https://www.sunlife.com/us>.
 - Click on the "Privacy" link at the bottom of the home page.
 - The webform is in the section for respecting your privacy in the United States. We may require you to provide additional information so that we can verify your identity and process your request.
4. Fill out a Sun Life request form
 - Go to <https://www.sunlife.com/us>.
 - At the bottom of the home page, select "Find a Form."
 - In the "Employee benefits forms" section, use the drop-down menu and select "Miscellaneous" forms.
 - Select the Consumer Individual Rights Request Form for California Residents. Once completed, follow the directions on the form to send it back to us.
5. Ask an authorized agent to make a request for you
 - If an authorized agent makes a request on your behalf, we will require signed permission from you giving the agent the authority to make the request.
 - If applicable, this may include proof that you granted your authorized agent power of attorney pursuant to California probate law.

When we receive your request in any of the ways listed above, we will use the information you provide to verify your identity. We will contact you if we need more information to verify your identity. Sun Life may not be able to complete your request if we cannot verify your identity, your authorized agent's identity, or your signed authorized agent permission.

Access to your personal information

You have the right to request that we disclose to you:

- Categories of personal information we have collected about you
- Categories of sources from which we collect your personal information
- Business or commercial purposes for collecting, selling, or sharing your personal information
- Categories of third parties to whom we disclose your personal information
- Categories of personal information that we have disclosed about you for a business purpose
- Specific pieces of personal information we have collected about you in the 12 months preceding your request. You may request information beyond the 12-month period, unless it would be impossible for us to provide it or involve disproportionate effort.

You may make up to two requests in any 12-month period.

Correction

If we have inaccurate information about you, you have the right to request that we correct it. When we get a correction request, we will make reasonable efforts to correct any inaccurate information.

Deletion

You have the right to request that we delete your personal information. We will promptly consider all deletion requests. However, we can retain your information under certain conditions, even if you ask us to delete it. An example includes when we need to retain your personal information to process an insurance claim you filed or to comply with record retention requirements. If we deny your request, we will notify you of the reason for the denial.

Nondiscrimination

We will not discriminate against you because you have chosen to exercise any of your privacy rights listed above. We also do not discriminate in employment on account of any legally protected category under federal, state or local law.

Last updated: July 1, 2023