

# Privacy Notice

Rev. 01/20

# VENERABLE™

FACTS	WHAT DOES VENERABLE INSURANCE AND ANNUITY COMPANY (“VIAC”) DO WITH YOUR PERSONAL INFORMATION?
Why?	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.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• Social Security number and account balance</li> <li>• Assets and transaction or loss history</li> <li>• Investment experience and employment information</li> </ul>
How?	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 VIAC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does VIAC 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, detect and prevent fraud, 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>	No	We don’t share
<b>For our affiliates’ everyday business purposes</b> – information about your transactions and experiences	Yes	No
<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

Questions?	Call the telephone number listed on your statements and other correspondence.
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Who we are	
Who is providing this notice?	This notice is provided by Venerable Insurance and Annuity Company, Directed Services LLC, Venerable Holdings, Inc. and VIAC Services Company.

What do we do	
How does VIAC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does VIAC collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• give us your contract information</li> <li>• add money to your account or request other transactions</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.
Why can’t I limit all sharing?	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.

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>Financial affiliates include Directed Services LLC, and Venerable Holdings, Inc.; nonfinancial affiliate is VIAC Services Company.</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>VIAC does not share personal information with nonaffiliates so they can market to you.</li> <li>In today's insurance and investment marketplaces, companies and customers often desire enhanced responsiveness and maximum efficiency. Cognizant Technology Solutions Services, LLC works on behalf of VIAC as a third-party administrator to perform certain administrative functions, which may include things such as check processing, account maintenance functions, withdrawals and claims.</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>VIAC does not jointly market.</li> </ul>

The following applies to individuals only as and to the extent required by state law. You may live in a state that does not have an applicable law, or the law may contain exemptions that make this notice inapplicable to you. If you live in California or Vermont the laws restrict the sharing of your personal information, we will not share information we collect about you with nonaffiliates, unless the law allows, and we will limit sharing among our affiliates to the extent required by state law.

<b>DO NOT SELL</b>	<b>VIAC DOES NOT SELL PERSONAL INFORMATION</b>
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<b>Categories of personal information we collect</b>	The categories of personal information we collect depend on the product or service you have with us and may include your name, postal address, email address, Social Security number, driver's license number, passport number, professional or employment-related information and other financial information. If you visit our website, we may collect your Internet Protocol (IP) address, browsing history, search history and information regarding your interaction with our web sites, applications and advertisements.
<b>Purposes for which we collect personal information</b>	The business purposes for which we collect personal information include the provision of financial products and services (e.g. maintaining accounts, processing payments, servicing customers), auditing consumer interactions and transactions, detecting security incidents and preventing fraud, identifying and repairing errors that impair functionality, activities to verify or enhance the quality of services, and other internal uses permitted under applicable laws.
<b>Third parties with which personal information is shared</b>	All financial companies need to share personal information to run their everyday business. The categories of third parties with which VIAC shares personal information include service providers, third party administrators, brokers, independent agents, plan sponsors, managing general agents, program administrators and affiliates. <b>If you are a participant in a retirement plan sponsored by your current or former employer, our contract with your plan sponsor may contain additional restrictions on the use or sharing of your personal information.</b>

Individual Rights	Description
<b>Right to deletion</b>	Your right to request that VIAC delete your personal information, unless it is necessary for us to retain it for a purpose permitted by law.
<b>Right to disclosure</b>	Your right to request that VIAC disclose to you the following: (1) the categories of personal information we have collected about you, (2) the categories of sources from which the personal information is collected, (3) the business or commercial purpose for collecting the personal information, (4) the categories of third parties with which we share the personal information, and (5) the specific pieces of personal information we have collected about you.
<b>Right to information about onward disclosures</b>	Your right to request that VIAC disclose to you the following: (1) the fact that we do not sell your personal information, and (2) the categories of your personal information that we have disclosed for a business purpose.
<b>Right to prohibit sales</b>	Your right to direct a business that sells personal information to third parties not to sell your personal information. VIAC does not sell personal information.
<b>Right to fair treatment</b>	We may not discriminate against you for exercising any of your individual rights, such as by denying you products or services, charging you different prices or rates, or providing a different level or quality of products and services

<b>To Exercise Your Individual Rights</b>	<ul style="list-style-type: none"> <li>Call the telephone number listed on your statements and other correspondence or go to <a href="https://www.venerableannuity.com/venerableemailcall.html">https://www.venerableannuity.com/venerableemailcall.html</a></li> <li>This notice is available at <a href="https://www.venerableannuity.com/pdf/privacynotice.pdf">https://www.venerableannuity.com/pdf/privacynotice.pdf</a></li> </ul>
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