

Privacy Notice

Rev. 09/19

FACTS	WHAT DOES VENERABLE INSURANCE AND ANNUITY COMPANY (“VIAC”) DO WITH YOUR PERSONAL INFORMATION?
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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"> • Social Security number and account balance • Assets and transaction or loss history • Investment experience and employment information
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?
For our everyday business purposes – 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
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness	No	We don’t share
For our affiliates to market to you	No	We don’t share
For nonaffiliates to market to you	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 and certain of its affiliates. A list of these companies is provided at the end of this notice.
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?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • give us your contract information • add money to your account or request other transactions • seek advice about your investments • tell us about your investment or retirement portfolio <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes – information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Financial affiliates include Directed Services LLC, and Venerable Holdings, Inc; nonfinancial affiliate is VIAC Services Company.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • VIAC does not share personal information with nonaffiliates so they can market to you. • 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.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • VIAC does not jointly market.

VIAC affiliates	
This notice is provided by: Venerable Insurance and Annuity Company; Directed Services LLC, Venerable Holdings, Inc and VIAC Services Company.	