

# Online Privacy Notice

**Last Updated: December 21, 2022**

Effective:

This online privacy notice ("Online Privacy Notice") is being provided by the following companies (collectively, "MassMutual", "we", "us", or "our"):

- Massachusetts Mutual Life Insurance Company
- C.M. Life Insurance Company
- MML Investors Services, LLC
- MML Bay State Life Insurance Company;

We are committed to maintaining your confidence and trust as it relates to the privacy of your information. Please read below and learn how we collect, protect, share and use your information as part of our technology platforms, including, without limitation, our websites, interactive features, applications, and social network pages ("Platforms").

## **1. INFORMATION WE COLLECT ON OUR PLATFORMS**

### Information You Provide To Us

We may collect Personal Information (information that can be used to identify you as an individual) such as your name, email, telephone number, home address, demographic information (such as zip code, age), payment information (such as account or credit card number), Social Security number, medical and health information, checking history, account balances. The types of Personal Information we collect may vary depending on your use of the features of the Platforms. If you are a customer of MassMutual and use the Platforms to access account, contract or policy information, we will handle your personal information in accordance with our customer privacy notices, which you may [access here](#).

## Information We Collect Automatically

**Usage Information.** Whenever you visit or interact with the Platforms, we, as well as any third-party advertisers and/or service providers, may use a variety of technologies that automatically or passively collect information about how the Platforms are accessed and used (“Usage Information”). Usage Information may include browser type, device type, operating system, application version, the page served, the time, the preceding page views, and your use of features or applications on the Platforms. For example, we use session replay tools to record your interactions with the Platforms, such as how you move throughout our Platforms and engage with our webforms. We may also collect geolocation information. This information helps us keep our Platforms fresh and interesting to our visitors and allows us to tailor content to a visitor's interests and to identify and fix technical issues with the Platforms.

**Device Identifier.** We automatically collect your IP address or other unique identifier (“Device Identifier”) for the Device (computer, mobile phone, tablet or other device) you use to access the Platforms. A Device Identifier is a number that is assigned to your Device when you access a website or its servers, and our computers identify your Device by its Device Identifier. We may use a Device Identifier to, among other things, administer the Platforms, help diagnose problems with our servers, analyze trends, track users’ web page movements, help identify you and your interests, and gather broad demographic information for aggregate use.

**Cookies; Pixel Tags.** The technologies used on the Platforms to collect Usage Information, including Device Identifiers, include but are not limited to: cookies (data files placed on a Device when it is used to visit the Platforms), mobile analytics software and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed), Software Development Kits (“SDKs”), embedded scripts, and other tracking technologies. Cookies may contain a cookie ID that we and third parties can use to track you and your device across digital properties over time. For example,

cookies may be used to associate you with social networking sites like Facebook and Twitter and, to enable interaction between your activities on the Platforms and your activities on such social networking sites. We, or our vendors, may place cookies or similar files on your Device for security purposes, to facilitate site navigation, to perform analytics, personalize your experience while visiting our Platforms (such as allowing us to select which ads or offers are most likely to appeal to you, based on your interests, preferences, location, or demographic information), and to personalize advertising to you (by us and our third party partners), such as on social media sites and through other online and offline interactions. A pixel tag may tell your browser to get content from another server or send content to another server or third party.

To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your browser's cookie folder, or prevent tracking activities, please refer to your browser's tools or help menu or other instructions related to your browser. Because an industry-standard Do-Not-Track protocol has not yet been established, we do not currently honor "Do Not Track" signals sent by browsers. However, you may refuse to accept cookies in order to prevent tracking activities. If you do disable or opt out of receiving cookies, please be aware that some features and services on our Platforms may not work properly because we may not be able to recognize and associate you with your account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

## **2. HOW WE USE THE INFORMATION WE COLLECT**

We use the information we collect about and from you for a variety of purposes such as to respond to your questions and requests for services; provide you with access to certain areas and features of the Platforms such as certain products and services; purchase history; verify your identity; communicate with you about your account and activities on the Platforms and, in our discretion, changes to any of our policies; tailor content, advertisements, and offers we serve you; improve the Platforms; comply with license obligations; and for purposes disclosed at the time you provide your Personal

Information or otherwise with your consent. We may also collect your location based information for the purpose of providing you with certain services.

### **3. SHARING OF INFORMATION**

Except as described in this Online Privacy Notice or in our customer [privacy notices](#), and other privacy notices, we will not provide any of your Personal Information to any third parties without your consent. We may also share your information as disclosed at the time you provide your information. Examples of how we share information include:

Third Parties Providing Services. We may share your Personal Information with third parties that perform functions on our behalf (or on behalf of our partners) such as:

- Agents, brokers and others who provide our products and services to you;
- Our affiliated companies, such as insurance or investment companies, insurance agencies or broker-dealers;
- Nonaffiliated companies in order to perform standard business functions on our behalf including those related to processing transactions you request or authorize, or maintaining your account or policy; service providers that host or operate our Platforms, analyze data, process transactions and payments, fulfill orders, or provide customer service; advertisers (including but not limited to ad platforms and networks, social media platforms, and cookie and other online technology providers that facilitate advertising); sponsors or other third parties that participate in or administer our promotions, contests, sweepstakes, surveys or provide marketing or promotional assistance and “powered by” partners or partners in co-branded sites. Your Personal Information may also be used by us or shared with our sponsors, partners, advertisers or other third parties to provide you with product information and promotional and other offers.
- Credit bureau reports;
- Other financial institutions with whom we may jointly market products, if permitted in your state.

Your Agreement to Have Your Personal Information Shared. In addition to the data sharing described above, while on our Platforms, you may also have the opportunity to opt-in to receive information and/or marketing offers from third parties regarding third party products or services or to otherwise consent to the sharing of your information with a third party. If you agree to have your Personal Information shared, your Personal Information will be disclosed to the third party and the Personal Information you disclose will be subject to the privacy policy and business practices of that third party.

Business Transfers. We may share your Personal Information with other entities and our affiliates primarily for business and operational purposes. In the event that we are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction.

Legal Disclosure. We may transfer and disclose your information to law enforcement, government agencies, and other third parties to comply with a legal obligation; or when we believe in good faith that the law or a governmental authority requires such disclosure; to verify or enforce our Terms of Use or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect our rights or property or security of third parties, visitors to our Platforms or the public.

Aggregate Data: We may share aggregate data with third parties.

#### **4. INFORMATION WE RECEIVE FROM THIRD PARTIES**

We may receive information about you from third parties such as consumer or other reporting agencies and medical or health care providers; through your interactions with our affiliated companies; from data brokers; and from lead generation or referral partners. In addition, if you are on another website and you opt-in to receive information from us, that website will submit to us your email address and other information about you so that we may contact you as requested. You may also choose to participate in a third party application or feature (such as one of our Facebook (Meta) or Twitter applications or a similar application or feature on a third party website) through which

you allow us to collect (or the third party to share) information about you, including Usage Information and Personal Information such as lists of your friends, “likes”, comments you have shared, groups and location. Third parties (such as social media companies) may also give you the option to post information about your activities on our Platform to your profile page to share with others within your network. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections” or information about you is otherwise accessible through your “connections” web page, profile page, or similar page on a social networking or other third party website or interactive service. We may supplement the information we collect about you through the Platforms with such information from third parties in order to enhance our ability to serve you, to tailor our content to you and/or to offer you opportunities to purchase products or services that we believe may be of interest to you.

## **5. YOUR PRIVACY RIGHTS, CHOICE AND ACCESS**

You control the Personal Information that you provide to us on the Platforms, but some Personal Information is required by us in order for you to obtain services from us or for you to use the Platforms. If you choose not to provide us with your Personal Information on the Platforms, you may not be able to take advantage of some of the services we offer or use some functionality on the Platforms. Except as provided above in section 3, we will not share Personal Information collected on the Platforms with third parties without your consent. You may also direct us to stop sending you promotional emails by following the removal instructions in a communication you receive from us. Your opt-out request will be processed within 10 business days of the date on which we receive it.

If you wish to modify, verify, correct, or delete any of your Personal Information collected through the Platforms, you may edit your registered user information. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Platforms. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. It may not always be possible to

completely remove or delete all of your information from our databases without some residual data because of backups and other reasons. We will retain your information (including geo-location data) for as long as your account is active or as needed to provide you services. If you wish to cancel your online account or request that we no longer use your information to provide you services through the platform, [contact us](#). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We do not control certain privacy settings and preferences maintained by our social media partners like Facebook (Meta) and Twitter. If you wish to make changes to those settings and preferences, you may do so by visiting the settings page of the appropriate social media site.

## **6. ADVERTISING**

We may use third party ad network providers to help present ads on the Platforms, as well as other service providers to evaluate and provide us with information about the use of the Platforms and viewing of our content. We do not share Personal Information with these providers (except as described in Section 3 above or in other circumstances with your permission). Such providers may place and access cookies, pixel tags, or similar technologies on your Device to serve you ads or other content personalized to your interests which they infer from your browsing on the Platforms and other sites you have visited. In doing so, the provider collects or has access to information about you and your device, such as your Usage Information. The use of cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

## **7. CHILDREN**

The Platforms are not directed to children under 13. We do not knowingly collect, use or disclose personally identifiable information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records.

## **8. SECURITY OF YOUR INFORMATION**

We take information security seriously and use certain reasonable security measures to help protect your Personal Information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use the Platforms and provide us with your information at your own risk.

## **9. OTHER SITES**

The Platforms may contain links to other sites that we do not own or operate. This includes links from advertisers, sponsors and/or partners that may use our logo(s) as part of a co-branding or co-marketing agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies to your Device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Platforms (including those linked to through an email or social networking page).

The Platforms may make available chat rooms, forums, message boards, and news groups. Remember that any information that you disclose in these areas becomes public information and is not subject to the provisions of this Online Privacy Notice.

## **10. CHANGES**

We may update this Online Privacy Notice to reflect changes to our information practices. If we make any material retroactive changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our Platforms prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **11. CONTACT US**

If you have any questions or concerns about this Online Privacy Notice, the practices of the Platforms, or your experiences with the Platforms, please call us at 1-800-272-2216.