PRIVACY POLICY

Introduction

At the Sun Life Financial group of companies,
protecting your privacy is important to us.
Whether you are an existing customer or considering a relationship with us, we recognize that
you have an interest in how we may collect, use and disclose information about you.

Sun Life Financial has a long tradition of protecting the privacy of its customers’ information. We
understand and appreciate the trust and confidence you place in us, and we take seriously our
obligation to maintain the confidentiality and security of your personal information.

We invite you to review this Privacy Policy which outlines how we use and protect that
information.

Our Collection of Information About You

Collecting information from you is essential to our ability to offer you high-quality insurance
products and service. When you apply for a product or service from us, we need to obtain
information from you to determine whether we can provide it to you. As part of that process, we
may collect information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name,
  address, social security number and date of birth;

- Information about your transactions with us, our affiliates or others, such as other
  insurance policies that you may own; and

- Information we receive from a consumer reporting agency, such as a credit report.

Limited Use and Disclosure of Information

We use the information we collect to provide the products and services you have requested and
to maintain and service your accounts. Once we obtain personal information from you, we do
not disclose it to anyone except as permitted or required by law.

We may share your information within Sun Life Financial to help us develop financial products
and services and to allow our member companies to inform you about them. In the United
States, the Sun Life Financial group of companies provides a range of products and services to
employers and their employees, including Group and Voluntary Life, Disability, Dental, Critical
Illness, Accident, and Stop-Loss insurance products. We also may disclose your information to
companies that help us conduct our business or perform services on our behalf, or to other
financial institutions with which we have joint marketing agreements. We require them to
protect the privacy of our customers’ information and permit them to use and disclose it only for
the purpose for which it is provided, as permitted by law.
There may also be times when Sun Life Financial is required to disclose its customers’ information, such as when complying with federal, state or local laws, when responding to a subpoena, or when complying with an inquiry by a governmental agency or regulator.

**Our Treatment of Information About Former Customers**

Our protection of your information extends beyond the period of your customer relationship with us. If your customer relationship with us ends, we will not disclose your information other than as permitted or required by law.

**Security of Your Information**

We maintain physical, electronic and procedural safeguards that comply with federal and state regulations to safeguard your information from unauthorized use or improper access.

**Employee Access to Your Information**

We restrict access to your information to those employees who have a business need to know it in order to provide products or services to you or to maintain your accounts. Our employees are governed by a code of conduct and are required to maintain the confidentiality of customer information.

**Questions**

Questions about this Privacy Policy may be directed to SLF_US_Privacy@sunlife.com.

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1 This notice applies to all Sun Life Financial companies and branches operating in the United States other than those that have adopted their own privacy policies. Massachusetts Financial Services Company has adopted its own separate privacy policy.