

ONLINE PRIVACY STATEMENT

(Sun Life Financial's Online Privacy Statement also applies to its affiliates including Sun Life Grepa Financial, Inc.)

Our Online Privacy Statement

Your privacy is important to us. We want you to understand how we safeguard your personal information and what types of information we receive and collect when you visit our websites.

Personal information and online security

When you visit a Sun Life website, you are anonymous unless you choose to identify yourself. You are not required to provide personal information to use our websites, unless a feature requires it. For example, if you have a policy or contract with us and wish to access your account online, you will need to provide identifying information. In these cases, we have physical, electronic and procedural safeguards in place to help protect your online personal information from unauthorized use or improper access. These safeguards may include:

- Passwords and personal identification numbers (PINs): Clients can access their account information online only after providing identifying information and a password or PIN. This information is unique to you, and is an important first step in protecting your information online.
- 128-bit encryption: Sun Life Financial uses a Secure Sockets Layer (SSL) protocol to protect personal information transmitted to us electronically. SSL transmitted information is encrypted, or scrambled, to prevent unauthorized reading of the electronic communication.

Although we have physical, electronic and procedural safeguards that we believe are adequate to protect personal information, any such systems may be subject to human and operational error. In particular, because the Internet is an open system, we cannot and do not guarantee that personal information entered by you online will not be misappropriated, intercepted, modified, deleted or used by others.

Online data collection tools: Improving and evaluating website functionality and effectiveness

Sun Life, like many organizations, sometimes gathers data, such as your IP address, regarding how visitors explore our websites - information about the number of new and repeat visitors, where on the website a visitor explores, how long they visit, where they are geographically located and similar details. We may also track how many users visit advertisements promoting our products and services that appear on other company websites. All such information is collected in an unidentifiable form and is used to improve our websites' performance and functionality, create a better experience for our visitors, measure the response to web marketing campaigns and provide you with more relevant content based on your possible interests in Sun Life content, products and services.

Sun Life or its agents on our behalf collect this information through the use of cookies and electronic images known as web beacons.

What are cookies and web beacons?

A **cookie** is a small piece of information that a website sends to your computer where it is stored on your hard drive. The next time you visit our website, we may use the information stored on your cookie to make your visit easier. A cookie does not tell us your identity unless you have chosen to provide it to us. Cookies cannot access other information or files from your computer. There are 2 types of cookies - **session cookies** and **permanent or persistent cookies**.

A session cookie (sometimes called a "transient" cookie) is erased when you close your Internet browser and leave our website. In the United Kingdom, only session cookies are used.

A "permanent" cookie is a file that remains on your computer when you close your Internet browser. A permanent cookie can be read only by the website that created the cookie when you revisit that site. Permanent cookies are not used in all of our jurisdictions.

Cookies can identify a visitor only if the visitor has used a website's login feature. If you ask us to save your access ID to be used the next time you visit our website, we will use a permanent cookie to store your access ID in an encrypted format on your computer so that the next time you visit the website you will be recognized when you sign in. In this way, the website can recall your preferences and provide a more customized experience.

Permanent cookies have expiry dates and are automatically deleted from your computer after their expiry date. You can also clear your stored cookies via your browser preferences on your computer. However, unless you have settings that disallow cookies, the next time you visit our website, a new cookie will be added. You can set your website browser to notify you when you receive a cookie so that you can decide whether to accept or reject it. Since the procedure for altering preferences varies by browser you should check the "Help" menu of your browser to learn how to alter your cookie preferences. Please note, however, that rejecting cookies while visiting a Sun Life website may result in certain parts of the website not functioning correctly or as efficiently as if cookies were allowed.

The permanent cookies that may be placed on your computer by the Google Display Network relating to web marketing campaigns are used to increase the relevance of display ads you may see when you visit other websites that are serviced by the Google Display Network. To opt out of these cookies, select the opt out button on the [Google Privacy Centre page](#).

Web beacons are a collective term used to refer to "pixel tags", "web beacons" or "clear GIF images" embedded in a web page and usually invisible to the user. Web beacons are used for many of the same purposes as cookies, allowing Sun Life or its agents on behalf of Sun Life to compile aggregate statistics about website usage patterns, such as how many times a link or an area on a website is clicked.

All the information collected by any of these online tracking tools is non-personal and is not used in connection with any other information that could identify you personally unless you have entered your access ID and password or provided it to us through your permanent cookie.

We may share the site visit information obtained using cookies, web beacons and other similar technologies with Google Analytics or other agents to analyze online activity on our websites or in reaction to our online advertisements.

At this time, SLF U.S. does not alter its behaviour or change its services upon receiving Do Not Track requests, as described in California Assembly Bill 370.

Links to websites outside of Sun Life

To provide website visitors with more information that may be helpful to them, some of our websites contain links to other websites that are not affiliated with or maintained by Sun Life. We do not monitor the privacy practices of these third-party sites, and do not have authority over them. As a result, we do not assume any responsibility for the data collection policies and procedures of these sites.

Collection of personal information from children

Sun Life websites are not directed at children. Our member company websites do not knowingly collect information from children under the age of 18.

Please be aware that we may update and modify this online privacy statement at any time. Please review this section each time you access and/or use our websites.

Our Global Privacy Commitment

Sun Life is committed to protecting the privacy of all personal information provided to us. Using this information properly is at the root of our success; it provides us with insight to deliver the right products and services to you at the right time and in the right way. We have a long history of protecting personal information.

Our privacy commitment applies to all of our wholly owned subsidiaries and branch operations worldwide.

Our privacy commitment is about more than complying with applicable country privacy laws; it is about doing the right thing for the millions of people whose lives we touch every day through the use of their personal information, however collected or received by us. The following principles reflect our commitment to safeguarding personal information in our care:

- We keep your personal information and the business you do with us in strict confidence.
- We collect, use or disclose personal information from you only to provide you with financial and insurance products and services to help you meet your lifetime needs.

- We obtain personal information about you lawfully and fairly.
- We do not disclose personal information without your permission except where permitted or required by law or competent authority. But we may share personal information with our agents, service providers or, where permitted by law, our affiliates in connection with providing, administering and servicing our products and services on our behalf.
- Where we choose to have certain services, such as data processing, provided by third party agents or service providers on our behalf, we do so in accordance with applicable law. In some cases, we may transfer your personal information to our employees, service providers or agents located in countries other than where the information was provided.
- We are responsible for all personal information in our possession, including information transferred to third parties performing services on our behalf. All such persons, wherever they are located, are required by us to protect the confidentiality of your personal information in a manner consistent with our privacy policies and practices.
- We maintain appropriate procedures to ensure that personal information in our possession is accurate and, where necessary, kept up to date. To the extent required by applicable law, you may seek a correction of your personal information if you believe that the information we have is not accurate.
- We try to respond to requests for access to - or correction of - personal information as soon as reasonably possible. In circumstances where the law does not entitle you to access, we will explain why access is denied.
- We maintain technical and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use or modification. We limit access to those who have a business need to know.

Online privacy

Sun Life Financial has physical, electronic and procedural safeguards to help protect personal information provided through online transactions and activities. Read more about the methods we use to [help protect your information online](#).

On some of our websites, we may use online data collection tools to improve functionality, enhance security, evaluate the effectiveness of our websites and advertising campaigns, or provide visitors with a customized online experience. Read about our [online privacy statement](#) for more information about our use of cookies and web beacons.

Local privacy policies and codes

We are an international provider of financial products and services, operating in many countries around the world. In some countries in which we do business, this privacy commitment is supplemented by more detailed privacy policies or codes specific to the requirements of those countries. When you access or link to a local Sun Life website, read the privacy statement found on the local website to determine any local policies or codes that apply to your information in that region.

Contact information

Our Chief Privacy Officer for the enterprise is located at our corporate head office in Toronto, Canada, and we have privacy officers in each region where we do business. If you have any questions, concerns or complaints about protection of your personal information at Sun Life, contact a local privacy officer in your region:

[Bermuda](#)

[Canada](#)

[Hong Kong](#)

[Indonesia](#)

[Philippines](#)

[United Kingdom](#)

[United States](#)

Sun Life may update or modify this privacy commitment from time to time.