

MUTUAL TRUST'S GDPR STATEMENT

As many of our customers and business partners are aware, as of May 25, 2018, a new privacy law is in effect in the European Union (EU) and the European Economic Area (EEA) called the General Data Protection Regulation or the GDPR. The GDPR expands privacy rights granted to individuals in the EU and the EEA. The GDPR may apply to some of the activities of Mutual Trust Life Insurance Company, a Pan-American Life Insurance Group Stock Company ("Mutual Trust") and its affiliates even though we are headquartered in the United States. We are committed to GDPR compliance across our organization and services, and we have implemented and will continue to implement GDPR compliance efforts.

Leading up to the GDPR's implementation date, we have taken many steps in an effort to comply with the GDPR. We have re-assessed and updated our privacy notices. An updated General Privacy Practices Statement has been posted on our website in order to help our customers and business partners better understand how we collect, use, share and protect their personal information and to inform our customers and business partners how they can exercise any rights they may have under the GDPR. Please also review our updated Website Privacy Policy.

The GDPR also imposes certain requirements on "data controllers" and "data processors." A "data controller" is the individual or entity that determines the purpose for which and the manner in which personal data is collected, used and processed. Mutual Trust is generally the data controller of the personal information we collect. A "data processor" is a person or entity that processes personal information on behalf of a data controller. Data controllers and data processors are required, among other things, to enter into an agreement with one another to protect the personal information that the data processor obtains from the data controller.

While we have been working on updating our privacy program in preparation for the GDPR, we recognize that protecting our customers and business partners' personal information is an ongoing process. We continue to take steps to enhance data privacy and security for our customers and business partners, and Mutual Trust will continue to review its practices as additional guidance under the GDPR or other applicable regulations are issued.

If you have any questions or comments about our privacy practices and GDPR compliance efforts, please do not hesitate to contact our Privacy Officer via email at seneczkoj@mutualtrust.com, or via mail at Mutual Trust Life Insurance Company, Attn: Privacy Officer, 1200 Jorie Boulevard, Oak Brook, Illinois 60523. If you wish to discuss an issue by phone, please email us with your contact information and best times to reach you, and we will contact you as soon as it is practical.