

MUTUAL TRUST'S WEBSITE PRIVACY POLICY

Mutual Trust Life Insurance Company, a Pan-American Group Stock Life Insurance Company, and its controlled affiliates, subsidiaries and branches (collectively, "Mutual Trust") strongly believes in the value of privacy. As described in this Privacy Statement, Mutual Trust is committed to properly using and safeguarding the privacy of all personal information that is collected from you when you visit and use our website. This Privacy Statement may be modified or supplemented in order to comply with specific legal and regulatory requirements.

By accessing our website, you consent to the data collection and use practices described in this Privacy Statement.

This Privacy Statement explains the steps we take to protect personal data collected on our website, including:

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1. What is covered by this Privacy Statement?

This privacy statement applies to the information we collect on this website. It does not apply to any information we may collect offline or through other means, including any other Mutual Trust website and/or third party website.

2. What kind of information do we collect from you?

Data collected directly from website visitors. In most instances, you can visit our website without providing any personal data. However, on some pages, you may give us your personal data by filling out forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- request information on our products or services
- create an account on our website
- subscribe to our blog or newsletter
- request marketing information
- enter a competition, promotion or survey
- give us feedback or contact us

The personal data that we collect may include:

- contact details, such as your name, title, company/organization name, email address, telephone and fax numbers, date of birth and physical address
- information about your company and job position

We may also collect information on:

- your preferences with respect to email marketing
- your profile including username and password, your interests or preferences, feedback and survey responses
- your inquiries about our products and services, as well as information that assists us in identifying the best products and services for you
- contest entry and event registration information
- feedback from you about our products and services, including our websites.

You are not required to provide any information. However, if you choose not to, we may not be able to provide you with the service you request or complete your transaction.

Data collected by automated means. We collect certain data about all visitors to our website, including what pages they view, the number of bytes transferred, the links they click, and other actions taken within our websites. We may also use this information to improve our security measures. We also collect certain standard information that your browser sends to every website you visit, such as your Internet Protocol (IP) address, your browser type and capabilities and language, your operating system, the date and time you access the site, and the website from which you linked to our site.

3. Our Use of “Cookies”

Cookies are small files that websites save to your hard disk or to your browser's memory. Our website may use them to track the number of times you have visited the website, to track the number of visitors to the website, to determine and analyze visitors' use of our website, to store data that you provide (such as your preferences), and to store technical information related to your interactions with our website. We may also use session cookies, which are deleted when you close your browser, to store your user ID, to facilitate your movement around our websites.

Our website may also contain electronic images known as Web beacons—sometimes called single-pixel gifs—that allow us to count the number of users who have visited those pages. We may include Web beacons in promotional email messages or newsletters in order to determine whether messages have been opened and acted upon, including whether the recipient clicked on a link in the email or forwarded the email to another person.

Adjusting Browser Settings to Manage Cookies or Send “Do Not Track” Signals:

Many Internet browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies or to notify you when a cookie is being placed on your computer. If you choose not to accept cookies, you may not be able to experience all of the features of our websites. Internet browsers also enable you to delete existing cookies, although this means that your existing settings (including stored user IDs and other preferences) will be lost. Some web browsers may also give you the ability to enable a “do not track” setting. This setting sends a signal to the websites you encounter while web browsing. This “do not track” signal is different from disabling tracking capabilities by declining cookies in your browser settings, as browsers

with the “do not track” setting still enabled may continue to accept cookies. Mutual Trust does not respond to web browser “do not track” signals at this time.

Social Media Third Party Cookies

During your visit to this website, you may notice embedded content from other social media websites. These websites may also contain cookies. Mutual Trust has no control or responsibility for these cookies. You should check the third party’s cookie policy for more information.

4. Our Use of Personal Information

We will use personal data collected from our website only for the purposes set forth below.

Services and transactions. We use personal data to deliver services or execute transactions you request, such as providing information about Mutual Trust products and services, answering customer service requests, and facilitating use of our website. Information collected by our website may be combined with information we collect by other means, such as phone, e-mail or paper.

Website improvement. We may use data about you to improve our website (including our security measures) and related products or services, or to make our website easier to use by eliminating the need for you to repeatedly enter the same information, or by customizing our website to your particular preference or interests.

Marketing Communications. With your permission, we may use personal data to inform you of products or services available from Mutual Trust. When collecting information that might be used to contact you about our products and services, we will give you the opportunity to opt-out from receiving such communications. Moreover, each email communication we send will include an unsubscribe link allowing you to stop delivery of that type of communication. If you elect to unsubscribe, we will remove you from the relevant list within 10 business days.

Employment Applications. In connection with a job application or inquiry, you may provide us with data about yourself, including your educational background, résumé or curriculum vitae, and other information, including your ethnicity where required or permitted by law. We may use this information throughout Mutual Trust and its affiliates for the purpose of employment consideration. We will keep the information for future consideration unless you direct us not to do so.

5. Sharing of Personal Information

Your personal information may be shared with other Mutual Trust affiliates to provide the services you request. All Mutual Trust affiliates are governed by this Privacy Statement or are bound by appropriate confidentiality and data transfer agreements.

Mutual Trust will share your personal information collected from our website with third parties only in ways that are described in this Privacy Statement. We do not sell your Personal Information to third parties. Your personal information is never shared outside Mutual Trust without your permission, except under conditions explained below.

Disclosure to service providers. Mutual Trust contracts or may contract with other companies to provide services, such as hosting websites, sending out information, processing transactions, and analyzing our websites. We provide these companies with only those elements of personal

data they need to deliver those services. These companies and their employees are prohibited from using the personal data for any other purposes.

Disclosure for other reasons. We may disclose personal data if required to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or respond to court orders, to protect and defend our rights or property, or in urgent circumstances to protect the personal safety of any individual.

Mutual Trust stores data in controlled servers with limited access. Your information may be stored and processed in the United States or any other country where Mutual Trust's affiliates are located.

6. International Transfers of Personal Information

We may transfer personal information that we collect through our website to, and store such information in, countries other than the country from which that information was initially collected or the countries from which individual site visitors may access the website. The countries, including the U.S. (and the other countries around the world where our individual affiliates, suppliers, or business partners maintain offices), to which we may transfer such information may have different data protection laws than the countries from which the information was initially collected or from which individual website visitors access the website.

By choosing to use our website and to submit personal data to us through it, you consent to the transfer of such information outside of your country. To the extent required by applicable law, when we transfer your personal information to recipients in other countries, we will take measures to protect that information.

7. How long do we keep personal information?

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a potential of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

8. How do we protect personal information?

We have appropriate security measures to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed in an unauthorized way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator or any other legally required government official of such a breach.

9. Links to Third Party Websites

Our website may contain links to other websites on the Internet that are owned and operated by third parties. These websites operate independently from our website. We do not control them and we are not responsible for the content, security or privacy practices employed by them. You should review the privacy statements of those websites to determine how they protect and use personal data.

10. How do we manage the information of a child?

Our website is not intended for children under 13 years of age. We do not knowingly gather information from anyone under age 13. If we find out that we have collected information from a child under age 13, we will delete that information immediately.

11. Your Rights

To the extent provided by the law of your jurisdiction, you may have the right to (1) access certain personal information we maintain about you; (2) request that we update, correct, amend, erase or restrict your personal information; or (3) exercise your right to data portability. Where provided by law, you may withdraw consent you previously provided to us or object at any time to the processing of your personal information on legitimate grounds relating to your particular situation, and we will apply your preferences going forward as appropriate. To exercise these rights, please contact our Privacy Officer at (800) 323-7320, extension 5481 or senczkoj@mutualtrust.com.

We try to respond to all legitimate requests within thirty (30) days. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Contacting us about privacy questions or concerns

If you have any questions about this privacy statement or our handling of personal data, please contact us by email to senczkoj@mutualtrust.com or you can write to us at:

Mutual Trust Life Insurance Company

Attn: Privacy Officer

1200 Jorie Boulevard

Oak Brook, Illinois 60523

13. Privacy Practices Changes

Mutual Trust may occasionally update this Privacy Statement. When we do, we will revise the "last update" date at the bottom of the Privacy Statement. You should revisit this page periodically to become aware of the most recent privacy terms. Your use of the website after such changes have been posted constitutes your agreement to such changes.

This Privacy Statement was last updated as of April 16, 2019.