



## **Corebridge Bermuda Services Limited and Corebridge Insurance Company of Bermuda Ltd.**

### **Employee and Non-Employee Worker Personal Information Privacy Notice**

#### **1. Introduction**

Corebridge Bermuda Services Limited and Corebridge Insurance Company of Bermuda Ltd. (“Corebridge,” “we,” or “us”) value the trust of our workforce and are committed to handling Personal Information appropriately in accordance with applicable law. This Employee and Non-Employee Worker Personal Information Privacy Notice (the “Notice”) applies to employees and other workers and/or directors that are not employed by Corebridge but have access to Corebridge facilities and/or corporate networks and systems (hereinafter, “Employee” and “Non-Employee Worker,” respectively).

The purpose of this Notice is to explain what Personal Information we collect, access, use, store, transfer and disclose (together, “process”), and why, in connection with your employment or engagement by us. As used in this Notice, “Personal Information” refers to information about you and other identified individuals connected to you (for example, your partner or other members of your family), including any information from which you or they are identifiable.

This Notice may be supplemented by other privacy notices that are specific to certain jurisdictions, certain ways of using your Personal Information, are used to provide summary information or for other specific reasons, as detailed in such supplemental notices. Please note that, unless otherwise stated, such supplemental notices are designed to be complementary and should be read in conjunction with this Notice.

#### **2. Who Is Responsible For Your Personal Information**

Each or both of the Corebridge affiliated entities set out above may act as the organization responsible for looking after your Personal Information in accordance with this Notice, our internal standards and procedures, and the requirements of data protection law.

In addition, please note that if you are a member of a locally administered Corebridge pension plan, the Trustees or scheme providers will be responsible for the Personal Information held and processed by the Trustees or scheme providers in connection with that plan.

#### **3. Personal Information We Process**

In the course of your employment or engagement we process Personal Information about you and/or Personal Information of other individuals that you may provide to us. The type and volume of Personal Information will vary depending on your relationship with Corebridge and the jurisdiction in which you work, but may include the following:

<b>Category of Personal Information</b>	<b>Examples</b>
<b>1. Personal Details</b>	Name, employee or other worker identification number, work and home contact details (email, phone numbers, physical address), language(s) spoken, date and place of birth, national identification number (if permitted by applicable local law), social security number, driver’s licence information, other government

	issued identification or registration numbers, gender, marital/civil partnership status, domestic partners, dependants, emergency contact information, and photographs, audio recordings, key card usage and videos, and in some instances, personal details of other individuals (such as your family members).
<b>2. Immigration Related Details</b>	Citizenship, passport data, details of residency and work permit.
<b>3. Compensation, Payroll, and Expenses</b>	Base salary, bonus, benefits, information related to insurance policy when provided by Corebridge, compensation type, changes in compensation, details on stock options, stock grants and other awards, currency, pay frequency, effective date of then-current compensation, salary reviews, banking details, working time records (including vacation and other absence records, leave status, hours worked and department standard hours), pay data, expenses and invoices, card/account number and the card/account use information, and termination date.
<b>4. Position</b>	Description of position(s), job title, corporate status, management category, job code, salary plan, pay grade or level, job function(s) and subfunction(s), company name and code (legal employer entity), branch/unit/department, location, employment status and type (including if you are a Non-Employee Worker), full-time/part-time, terms of employment or engagement, contractual terms, work history, hire/re-hire and termination date(s) and reason, length of service, retirement eligibility, promotions and disciplinary records, date of transfers, and reporting manager(s) information.
<b>5. Talent Management Information</b>	Details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications, language and other relevant skills, certification(s), certification expiration dates), information necessary to complete a background check (including credit check) (as further detailed in Section A (Managing and Administering the Workforce) in the table below under “How and Why We Process Personal Information” and to the extent permitted in your jurisdiction), details on performance management ratings, skills and experience, development programs planned and attended, e-learning programs, performance and development reviews and discussion ratings and comments, including dates for the foregoing, willingness to relocate, feedback expressed about you, and information that you have shared with us to populate employee biographies or to respond to surveys and questionnaires, unless specifically gathered anonymously.
<b>6. Corporate Shareholdings and Positions</b>	Details of any shares of common stock or directorships.
<b>7. Pension Records and Benefits Information</b>	Details of your membership of any pension scheme, payments made in connection with the scheme, financial information relating to the scheme and details of beneficiaries of the scheme. Details of enrolment for and use of other work-related benefits and related entitlements (such as private medical care).

<b>8. Administrative and Facility Records</b>	Records created in relation to business administration and organisation, such as communications, training, events, work-related travel arrangements and records of attendance at meetings or events, including in some cases transcripts and/or recordings of such meetings or events. Depending on your office location, imagery and other recordings captured through the operation of on-site CCTV monitoring and any technologies (such as badges or swipe cards) that are used to control and manage facility access.
<b>9. Data Related to System, Device, and Application Usage</b>	Information to access company systems or applications such as IT system ID, LAN ID, email account, instant messaging account, mainframe ID, previous employee ID, previous manager employee ID, system passwords, employee status reason, branch state, country code, previous company details, previous branch details, previous department details, audio or video recordings of you, and electronic content produced by you using Corebridge IT systems.
<b>10. Sensitive Personal Information</b>	<p>We may also collect certain Personal Information that is deemed “sensitive” under local law, such as information about health, medical information, disability status, financial information, religious beliefs, ethnicity, political opinions or trade union membership, sexual life and orientation, biometric information, passwords or information about criminal records or civil litigation history.</p> <p>As with any Personal Information, Corebridge will only process Sensitive Personal Information where permitted by applicable governing law.</p>

#### **4. Where Your Personal Information Comes From**

This Personal Information is obtained from a variety of sources, including:

- your communications with us;
- forms you complete as part of your employment or engagement (including during the recruitment process);
- third parties who undertake background checks on our behalf (both at recruitment stage and, in some instances, on an ongoing basis);
- any websites, intranet sites and online portals made available by us for use on or through computers or mobile devices, which you access and use in the course of your employment or engagement;
- the software applications made available by us for use on or through computers and mobile devices, which you access and use in the course of your employment or engagement, including wearable devices; and
- our social media content, tools, and applications, which you access and use in the course of your employment or engagement.

With the exception of certain information that is necessary to fulfill the employment or engagement contract, required by law or important to the performance of our business, your decision to provide Personal Information to Corebridge is voluntary. However, if you do not provide certain information, Corebridge may not be able to accomplish some of the purposes outlined in this Notice.

## **5. How and Why We Process Personal Information and the Legal Justification for Doing So**

We will process your Personal Information for a variety of different purposes during the course of your employment or engagement, and after you have ceased to be employed or engaged by us.

Data protection law seeks to ensure that the way Personal Information is processed is fair and this includes telling you the legal justification we rely on for using your Personal Information. While the law provides several legal justifications, the table below describes the main legal justifications that apply to our purposes for using Personal Information.

Unless we need your specific consent to use the information, we will rely on one or more of the following conditions of use:

- Deemed consent based on specific circumstances and as permitted by law;
- The use is necessary in the context of your present, past or potential employment relationship with us;
- Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that —
  - you would not reasonably be expected to request that the use of your Personal Information should not begin or cease; and
  - the use does not prejudice your rights;

This includes using your Personal Information for the purpose of providing coverage or enrolment under an insurance policy, trust, benefit or similar plan in which you have an interest or from which you derive a benefit, in addition to the provision of other contractual and non-contractual benefits that may be provided by Corebridge or third parties engaged by Corebridge for such purposes. It also includes cases where the use of your Personal Information is reasonable in connection with the establishment, exercise or defense of legal rights and claims by Corebridge, including in the context of legal proceedings.

- The use is necessary for the performance of a contract to which you are a party, or for taking steps at your request with a view to entering into a contract;
- The use is pursuant to a provision of law that authorises or requires such use;
- The use of the Personal Information is necessary to respond to an emergency;
- The Personal Information is publicly available and the use will be consistent with the purpose of its public availability; or
- use of the Personal Information is reasonable to protect or defend Corebridge in any legal proceeding.

## Sensitive Personal Information

Only as permitted by governing law applicable to your or us these more sensitive special categories of Personal Information include any Personal Information relating to an individual's place of origin, race, colour, national or ethnic origin, sex, sexual orientation, sexual life, marital status, physical or mental disability, physical or mental health, family status, religious beliefs, political opinions, trade union membership, biometric information or genetic information.

To the extent permitted by applicable local law, we will process Sensitive Personal Information only:

- In connection with legal proceedings;
- In accordance with the directions of a relevant regulator;
- In the context of recruitment or employment where the nature of the role justifies such use; or
- In all other cases, with your consent (but only in exceptional circumstances).

Processing of Personal Information relating to criminal convictions and offences is subject to the requirements of governing law applicable to you or us.

The purposes for which we process Personal Information, along with the type of Personal Information and the legal basis for which we process Personal Information, is set out in the table below. Corebridge will not process Personal Information for any other purpose incompatible with the purposes described in this Notice, unless it is required or authorized by law, authorized by you, or is in your own vital interest (e.g., in the case of a medical emergency).

Description of Purpose	Examples	Types Of Personal Information	Why We Process Personal Information
<b>A. Managing and Administering the Workforce</b>	Managing work activities and personnel generally, including recruitment, appraisals, performance management, promotions and succession planning, rehiring, administering salary, payment administration and reviews, wages and other awards such as stock options, stock grants and bonuses, healthcare where permitted by applicable governing law, pensions and savings plans, training, leave, managing sickness leave, transfers,	<ul style="list-style-type: none"> <li>✓ Personal Details</li> <li>✓ Immigration Related Details</li> <li>✓ Compensation, Payroll and Expenses</li> <li>✓ Position</li> </ul>	<ul style="list-style-type: none"> <li>✓ Use is necessary in the context of your present, past or potential employment relationship</li> <li>✓ Consent to the use of Personal Information for the purpose of coverage or enrolment</li> </ul>

	<p>secondments, honoring other contractual benefits, providing employment references, loans, performing workforce analysis and planning, performing Employee and Non-Employee worker surveys, performing background checks (including using your Personal Information, where permitted by applicable governing law, to undertake: ID checks, address verification, education and/or professional qualification verification, employment history verification, criminal or conduct checks, credit/bankruptcy/financial integrity checks, adverse media search, directorship search, regulatory checks (e.g. bribery and anti-corruption compliance), sanctions screening against sanction lists to identify criminal or fraudulent activity, terrorist watch-list search), performing ongoing licensing checks, investigating and managing disciplinary matters (including non-compliance with the Corebridge Code of Conduct (Code) and Conflicts of Interest in the case of employees) and fraud, grievances and terminations, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of training requirements and career development activities and skills, administering apprenticeship schemes, creating and maintaining one or more internal Employee and Non-Employee Worker directories, and ensuring equal employment opportunity and supporting the Company's diversity, equity, inclusion and belonging ("DEIB") initiatives.</p>	<ul style="list-style-type: none"> <li>✓ Talent management information</li> <li>✓ Management records</li> <li>✓ Pension Records and Benefits Information</li> <li>✓ Administrative and Facility Records</li> <li>✓ Data related to System, Device and Application Usage</li> <li>✓ Sensitive Personal Information</li> </ul>	<p>under an insurance, trust, benefit or similar plan where you have an interest in or derive a benefit from that plan</p> <ul style="list-style-type: none"> <li>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your Personal Information should not begin or cease; and 2) the use does not prejudice your rights</li> <li>✓ Needed to perform a contract with you or prepare to enter into a contract with you</li> <li>✓ Needed in the context of your present, past or potential</li> </ul>
--	--	--	---

			<p>employment relationship with Corebridge</p> <p>✓ The use is pursuant to a provision of law that authorises or requires such use</p> <p>✓ As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent</p>
<p><b>B. Maintaining Business Continuity</b></p>	<p>Ensuring business continuity (including contacting you using your personal contact details (e.g. personal email addresses or mobile phone numbers)), facilitating communication with you at an Corebridge office, when travelling, during working from home absent an emergency, protecting the health and safety of employees and others, safeguarding IT infrastructure, office equipment and other property, and facilitating communication with you and your nominated contacts in an emergency via any means we deem necessary to reduce any risk to you or others (for example by contacting you using your personal contact details by calling or sending SMS text messages).</p>	<p>✓ Personal Details</p>	<p>✓ Use is necessary in the context of your present, past or potential employment relationship</p> <p>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your Personal</p>



			<p>Information should not begin or cease; and 2) the use does not prejudice your rights</p> <p>✓ The use is pursuant to a provision of law that authorises or requires such use</p> <p>✓ The use is necessary in the context of your present, past or potential employment relationship with us</p>
<b>C. Managing and Improving Our Business and Operations</b>	<p>Operating and managing IT and communications systems, managing product and service development, improving products and services, managing and securing company premises and other assets, allocating company assets and human resources, strategic planning, project management, business continuity, Corporate Owned Life Insurance (COLI) underwriting, compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals, integration with purchasers and for external reporting and responses (e.g., responses to requests for bids, customer inquiries, government reporting requirements, participating in diversity benchmarking</p>	<p>✓ Personal Details</p> <p>✓ Immigration Related Details</p> <p>✓ Compensation, Payroll and Expenses</p> <p>✓ Position</p> <p>✓ Talent management information</p> <p>✓ Pension Records and Benefits Information</p> <p>✓ Administrative and Facility Records</p> <p>✓ Data related to System, Device and Application Usage</p>	<p>✓ Use is necessary in the context of your present, past or potential employment relationship</p> <p>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your</p>



	exercises or making submissions for diversity awards).		Personal Information should not begin or cease; and 2) the use does not prejudice your rights
<b>D. Complying with Legal, Regulatory Requirements, and Internal Policies and Procedures</b>	Complying with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations, performing background checks (as detailed above in section A (Managing and Administering the Workforce) above), conducting audits, compliance with government inspections and other requests from government or other public authorities, complying with guidance issued by our regulators, and responding to legal process such as subpoenas.	<ul style="list-style-type: none"> <li>✓ Personal Details</li> <li>✓ Immigration Related Details</li> <li>✓ Compensation, Payroll and Expenses</li> <li>✓ Position</li> <li>✓ Management records</li> <li>✓ Pension Records and Benefits Information</li> <li>✓ Administrative and Facility Records</li> <li>✓ Data related to System, Device and Application Usage</li> <li>✓ Sensitive Personal Information</li> </ul>	<ul style="list-style-type: none"> <li>✓ Use is necessary in the context of your present, past or potential employment relationship</li> <li>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your Personal Information should not begin or cease; and 2) the use does not prejudice your rights</li> <li>✓ The use is pursuant to a provision of law that authorises or requires such use</li> </ul>

<b>E. Defending Legal Rights</b>	<p>Pursuing legal rights and remedies, defending litigation, and managing any internal complaints or claims, conducting investigations, and enforcing with internal policies and procedures.</p>	<ul style="list-style-type: none"> <li>✓ Personal Details</li> <li>✓ Immigration Related Details</li> <li>✓ Compensation, Payroll and Expenses</li> <li>✓ Position</li> <li>✓ Talent management information</li> <li>✓ Management records</li> <li>✓ Pension records</li> <li>✓ Administrative and Facility Records</li> <li>✓ Data related to System, Device and Application Usage</li> <li>✓ Sensitive Personal Information</li> </ul>	<ul style="list-style-type: none"> <li>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your Personal Information should not begin or cease; and 2) the use does not prejudice your rights</li> <li>✓ Reasonable to protect or defend Corebridge in any legal proceeding</li> <li>✓ The use is pursuant to a provision of law that authorises or requires such use</li> </ul>
<b>F. Monitoring Workers and Systems</b>	<p>Monitoring – which includes the systematic and repetitive surveillance, tracking, analyzing, observing and/or reviewing an individual – designed to ensure compliance with internal policies, laws and for fraud and crime prevention including monitoring of (i) electronic and verbal communications, including</p>	<ul style="list-style-type: none"> <li>✓ Personal Details</li> <li>✓ Position</li> <li>✓ Data related to System, Device and Application Usage</li> </ul>	<ul style="list-style-type: none"> <li>✓ Use is necessary in the context of your present, past or potential employment relationship</li> </ul>

	<p>telephone, email, instant messaging, and other electronic messages, (ii) use of and access to information systems and technology made accessible by Corebridge, including internet usage and activity, IT hardware and software content, and other company resources, and (iii) Corebridge premises, including via Closed Circuit Television and building access logs.</p> <p>For more information about how and why Corebridge monitors individuals, please review Corebridge's <a href="#">Global Monitoring Notice</a></p>		<p>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your Personal Information should not begin or cease; and 2) the use does not prejudice your rights</p> <p>✓ The use is pursuant to a provision of law that authorises or requires such use</p> <p>✓ The use is necessary in the context of your present, past or potential employment relationship with us</p>
<b>G. Administering Benefits and Related Entitlements</b>	<p>Trustees of the Corebridge Pension Plan or Trustees of the Corebridge Retirement Savings Plan (together the Trustees), of which you are a member (if applicable) will process your Personal Information for management and administration of the plans (where applicable),</p>	<p>✓ Personal Details</p> <p>✓ Immigration Related Details</p> <p>✓ Compensation, Payroll and Expenses</p>	<p>✓ Consent to the use of Personal Information for the purpose of coverage or enrolment under an insurance, trust,</p>

	<p>to make decisions about the pension plans (e.g. to process transfer requests or to make decisions about the payment of benefits) and to carry out the duties of the Trustees. We will also process your Personal Information as needed to provide and administer other contractual and non-contractual benefits that are available to you and in some cases your family members.</p>	<p>✓ Pension Records and Benefits Information</p> <p>✓ Sensitive Personal Information</p>	<p>benefit or similar plan where you have an interest in or derive a benefit from that plan</p> <p>✓ Use is necessary in the context of your present, past or potential employment relationship</p> <p>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your Personal Information should not begin or cease; and 2) the use does not prejudice your rights</p> <p>✓ The use is pursuant to a provision of law that authorises or requires such use</p> <p>✓ Needed to perform a contract with</p>
--	---	---	--

			you or prepare to enter into a contract with you
<b>H. Facility Security and Management</b>	On-site CCTV monitoring is in operation at certain Corebridge facilities for the purposes of ensuring site security, access control management, crime prevention, monitoring and enforcing compliance with Corebridge internal policies and procedures, and where necessary in connection with the establishment, exercise or defence of legal claims. In addition, Corebridge facilities may adopt digital access solutions to enable the application of access controls and the information collected may be used to determine approximate location and individual movements when assessing compliance with Corebridge internal policies and procedures	<ul style="list-style-type: none"> <li>✓ Administrative and Facility Records</li> </ul>	<ul style="list-style-type: none"> <li>✓ Use is necessary in the context of present, past or potential employment relationship</li> <li>✓ Except in the case of Sensitive Personal Information, where a reasonable person giving due weight to the sensitivity of the Personal Information would consider that 1) you would not reasonably be expected to request that the use of your Personal Information should not begin or cease; and 2) the use does not prejudice your rights</li> </ul>
<b>I. Emergency Scenarios</b>	In the event of an emergency situation, such as a medical emergency, we may process your Personal Information and information relating to your family members (such as your emergency contacts) in order to address the emergency and to take appropriate action to protect your interests	<ul style="list-style-type: none"> <li>✓ Personal Details</li> <li>✓ Position</li> <li>✓ Sensitive Personal Information</li> </ul>	<ul style="list-style-type: none"> <li>✓ Use is necessary in the context of present, past or potential employment relationship</li> <li>✓ Necessary to respond to an emergency</li> </ul>



Type of Party	Examples
<b>Other Corebridge Group Companies and Departments</b>	<p>Access to Personal Information within Corebridge is required by policy to be limited to those who have a need to know the information for the purposes described above, and may include your managers and their designees, personnel in HR, IT, Compliance, Legal, Finance and Accounting and Internal Audit.</p> <p>All Employees and Non-Employee Workers within Corebridge will have access to your name, position and (i) business contact information, such as work telephone number, office postal address and work email address and (ii) personal contact information, such as personal cell phone number, home postal address and home email address to the extent you make such information generally available (e.g. via corporate directory).</p>
<b>Professional Advisors</b>	Accountants, auditors, actuaries and administrators, lawyers, insurers, bankers, administrators or managers of provident fund schemes and other outside professional advisors in all of the countries in which Corebridge operates or seeks to operate.
<b>Service Providers</b>	Companies that provide products and services to Corebridge such as payroll, pension scheme and benefits providers; human resources services, background check providers (and those background check providers may in turn share Personal Information with other third parties, such as former employers, education institutions, etc.), performance management, training, expense management, IT systems suppliers and support; fraud prevention and similar agencies; third parties assisting with equity compensation programs, credit card companies, medical or health practitioners, trade bodies and associations, and other service providers.
<b>Our Clients</b>	Companies that we provide or promote products and services to.
<b>Insurance and Insurance Distribution Parties, and Other Business Partners</b>	Other insurers, reinsurers, insurance and reinsurance brokers, other intermediaries and agents, appointed representatives, distributors, affinity marketing partners and financial institutions, securities firms, and other business partners.
<b>Public and Governmental Authorities</b>	Entities that regulate or have jurisdiction over Corebridge such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
<b>Other Third Parties</b>	In connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Corebridge business, assets or stock (including in connection with any bankruptcy or similar proceedings), or any other third party to whom you authorize us to share your Personal Information.



## **7. Where We Process Your Personal Information**

Due to the global nature of our business activities, for the purposes set out above (see section 6 above ‘**How and Why We Process Personal Information and the Legal Justification for Doing So**’) we may transfer Personal Information to parties located in countries other than where you reside. In some circumstances, this will include your Personal Information being processed in countries where the domestic data protection laws in place offer differential standards of protection than is found in the country where you are based. When making these transfers, we will take appropriate steps designed to ensure that your Personal Information is adequately protected and transferred in accordance with the requirements of data protection law, including by putting in place appropriate data transfer mechanisms such as model contractual clauses approved for use by the relevant supervisory or governmental authority (as applicable).

For further information about these transfers please contact us using the details below (see section 12 below ‘**How You Can Contact Us**’).

## **8. How We Secure Personal Information and Maintain Data Integrity**

Corebridge will take appropriate measures to protect Personal Information that are consistent with applicable privacy and data security laws and regulations. We use appropriate technical, physical, legal, and organizational security measures which comply with data protection laws to keep Personal Information secure.

When Corebridge engages a third party (including service providers) to collect or otherwise process Personal Information on our behalf, the third party is required by Corebridge to undergo a review of their security measures and enter an agreement that requires use of appropriate security measures to protect the confidentiality and security of Personal Information.

Corebridge will take reasonable steps designed to ensure that the Personal Information processed is reliable for its intended use and is accurate and complete for carrying out the purposes described in this Notice.

## **9. Personal Information You Provide About Other People**

If you provide us with Personal Information about another person, we will process that information in accordance with this Notice.

Before providing Personal Information about another person to us, you must (unless we agree otherwise) (a) inform the individual about the content of this Notice and any other applicable Corebridge privacy notice provided to you; and (b) obtain their permission (where possible) to share their Personal Information with us in accordance with this Notice and other applicable privacy notices.

## **10. Your Personal Information Rights**

The following is a summary of the data protection rights which are available to you in connection with your Personal Information. However, these rights only apply in certain jurisdictions/circumstances and are subject to certain legal exemptions.

If you wish to exercise your rights, please contact us using the details below (see section 12 below ‘**How You Can Contact Us**’).

Right	Description
Right of access to Personal Information	The right to receive a copy of the Personal Information we hold about you, information about the purposes for which we use it and the names of the persons or types of persons to whom and circumstances in which the Personal Information has been and is being disclosed.
Right to rectification of Personal Information	The right to ask us to correct an error or omission in any of your Personal Information we hold about you.
Right to erasure of Personal Information	This right is sometimes referred to as 'the right to be forgotten'. This is the right to request that your Personal Information be deleted or removed from our systems and records. However, this right only applies in certain circumstances.
Right to request we cease, or not begin, using your Personal Information	<p>The right to request that we cease, or not begin, using your Personal Information for the purposes of advertising, marketing or public relations.</p> <p>Additionally, an individual may request we cease, or not begin, using your Personal Information where the use of that Personal Information is causing or is likely to cause substantial damage or substantial distress to the individual or to another individual.</p> <p>Where we cease, or not begin, using your Personal Information for the aforementioned purposes, we will still be permitted to store your Personal Information.</p>
Right to complain to the Privacy Commissioner of Bermuda	If you think that we have processed your Personal Information in a manner that is not in accordance with data protection law, in accordance with applicable law, you may be able to complain to the Privacy Commissioner of Bermuda.

## 11. How Long We Keep Your Personal Information

We will keep your Personal Information only for as long as necessary given the reasons we collect and hold it. Please view the HR section of the Corebridge Records Retention Schedule for your country for information about retention periods applicable to Corebridge's HR-related Company Records. Corebridge's Global Record Retention Schedules are accessible via the Corebridge intranet. Where applicable, the Trustees of the Pension Scheme will hold your Personal Information for the duration of your membership of the pension plan and a period thereafter until all liabilities, including those of your decedents have ceased in the plan subject to any additional requirements that the Pension Regulator may deem necessary. Please note that retention periods may be extended in response to litigation, investigations, or similar proceedings.

## 12. How You Can Contact Us

For more details about your rights and how we collect, disclose and otherwise use your Personal Information please email Corebridge Bermuda Privacy Officer: Melissa Cozart at [melissa.cozart@corebridgefinancial.com](mailto:melissa.cozart@corebridgefinancial.com) or write to Corebridge Bermuda Privacy Officer, 2919 Allen Parkway, 3rd Floor, Houston, TX 77019.



For general questions, please contact Corebridge Bermuda Services Limited (CBSL) and Corebridge Insurance Company of Bermuda Ltd. at American International Building, 27 Richmond Road, Pembroke HM 08 Bermuda.

### **When this Notice Was Last Updated and How Future Changes Will Be Notified**

This Notice last updated in December 2025.

We review this Notice regularly and reserve the right to make changes at any time to take account of changes in our business activities and legal requirements, and the manner in which we process Personal Information. We will place updates on our intranet, inform you of the updates and where appropriate we will give reasonable notice of any changes.