

## Applicant and Employee Privacy Notice

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**Effective: January 2023**

**Last Updated: June 2026**

We respect your concerns about privacy. This Applicant and Employee Privacy Notice (the "Privacy Notice") describes the New York Life Family of Companies'\* privacy practices with respect to personal information we collect or obtain about individuals who are employees of the New York Life Family of Companies or who are applying for a position with, or have been recruited by, the New York Life Family of Companies This Privacy Notice applies to you only in your capacity as an employee or job applicant and does not apply to any personal information we may collect in the context of you being a customer or seeking to become a customer of the New York Life Family of Companies, or being an insured or beneficiary under a policy.

### Sources and Categories of Personal Information We Collect

We may collect personal information through online and offline means directly from you and from other sources, such as public sources and third parties (such as recruiting agencies) who help facilitate our recruiting efforts and to carry out and support human resources functions and activities. Please note that the types of personal information collected may differ depending on whether you are an applicant or employee. We may have collected the following personal information from applicants and employees in the preceding 12 months:

| Categories of Personal Information                        | Examples  |
|---|---|
| Identifiers and other personally identifiable information | Name, postal address, email address, telephone number, date of birth, banking information, IP address, and demographic information  |
| Characteristics of protected classifications              | Equal Opportunity Employer reporting details, such as age, sex, gender, race, ethnicity, medical condition (voluntary), marital status (voluntary) military and veteran status, disability, and gender identity (voluntary) |

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|--|---|
| Internet or other electronic network activity information  | Information regarding your interaction with our career and intranet websites, and use of company-provided equipment and technology  |
| Geolocation data   | General geolocation data (e.g., understanding the region you are located in based on your IP address)   |
| Professional or employment-related information   | Information you provide on resumes and employment applications, such as previous work history, job titles and certifications and licenses obtained, information about compensation, employee performance, and assigned personnel number   |
| Education information  | Information you provide on resumes and employment applications, such as degrees, certifications and licenses obtained   |
| Inferences drawn from personal information listed above to create a profile about an applicant or employee | Inferences drawn from professional or employment-related information and education information assist us with our recruiting efforts and help us carry out and support human resources functions  |
| Sensitive personal information   | Social Security Number, driver's license number, passport number or other government-issued identification, applicant and employee log-in credentials, race, citizenship and immigration status, contents of emails sent through company-owned equipment and technology, and health information |

We maintain record retention policies and procedures based on applicable law and business needs that determine how long we retain records, including those containing personal information.

## **Purposes for Collecting and Disclosing Personal Information**

We use the personal information listed in the section above to manage our recruiting efforts and career opportunities, and carry out and support human resources functions, including to: verify employee identity; provide compensation and benefits; carry out obligations under employment contracts; manage employee performance; perform workplace analytics and reporting; conduct training and talent development; manage information technology and communications systems, such as the corporate email system and company directory; facilitate incident reporting and security management; conduct ethics and disciplinary investigations; manage audit and compliance matters; comply with applicable legal obligations; and other general human resource purposes.

We may disclose any of your personal information listed in the prior section to our subsidiaries and affiliates, and service providers, to assist us with any of the recruiting and human resources purposes described in the paragraph above. We do not authorize our service providers to use or disclose the information except as necessary to perform services or functions on our behalf, or to comply with legal requirements.

We also may disclose personal information (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Please note that we leverage artificial intelligence and machine learning technologies in connection with your employment. Specifically, we may use these technologies to learn from publicly available sources and/or information you provide to us the regarding your skills, experience, titles, etc. that may be relevant to the position or projects in which we think you would be interested and/or to which you have applied. Such technologies are used to create scores associated with your profile that the Company uses as one of many factors considered in decisions regarding employment opportunities. New York Life personnel review the scores and profiles produced by these technologies prior to using them to make employment decisions.

### **For California Residents:**

Please note that although we collect certain categories of "sensitive personal information" as defined by the California Consumer Privacy Act ("CCPA") and described above, when we collect such information, it is collected in a context not subject to the CCPA's right to limit the use and disclosure of sensitive personal information. Such sensitive personal information is used and disclosed as necessary to manage our recruiting efforts and career opportunities and carry out and support human resources functions as reasonably expected by applicants and employees and is not collected or processed with the purpose of inferring characteristics about applicants or employees.

The New York Life Family of Companies does not "sell" or "share" personal information covered by this Privacy Notice (including the personal information of minors under the age

of 16) as those terms are defined in the CCPA.

## **Rights Under the CCPA and How to Exercise Them**

If you are a California resident whose personal information is covered by the CCPA and this Privacy Notice, you may have certain rights under the CCPA as listed below. We will comply with your request in accordance with, and to the extent permissible under, applicable law.

### ***The Right to Know***

You have the right to request that we disclose to you the following information:

- The categories and specific pieces of personal information we have collected about you;
- The categories of sources from which your personal information was collected;
- Whether we have shared or sold your personal information (we do not share or sell your personal information as those terms are defined in the CCPA)
- The business or commercial purpose for collecting, sharing or selling your personal information (we do not share or sell your personal information as those terms are defined in the CCPA); and
- The categories of third parties with whom we have disclosed your personal information.

### ***Deletion***

You have the right to request that we and our service providers delete any personal information which we have collected from you, subject to certain exceptions. We and our service providers will not delete your personal information if it is necessary or permissible for us or our service providers to maintain the personal information pursuant to the CCPA or other applicable law.

### ***Correction***

You have the right to request that we and our service providers correct inaccurate personal information that we maintain about you. Depending on the circumstances, we may require you to provide documentation supporting your request to correct your personal information. Pursuant to the CCPA, if you request correction of your personal information, we may delete such personal information as an alternative to correcting the information if deletion does not negatively impact you or you consent to the deletion. We and our service providers will not correct your personal information if it is necessary or permissible for us or our service providers to not correct the personal information pursuant to the CCPA or other applicable law.

### ***How to Exercise Your Rights***

California residents can exercise their rights listed above, or reach out to us with questions or concerns about our privacy practices, by emailing us at [HR\\_Central@newyorklife.com](mailto:HR_Central@newyorklife.com)

using the subject line: "CA Privacy Request", calling us at (800) 225-5695, or clicking [here](#). When submitting your request, please indicate whether you are a job applicant, employee or former employee. Note that, pursuant to the CCPA, you will not receive discriminatory treatment from us if you choose to exercise any of your CCPA rights, and you have the right not to be retaliated against for the exercise of your CCPA rights.

When you submit a CCPA Right to Know, Deletion, or Correction request, we will ask you to provide certain verification information, such as your relationship to New York Life, name, phone number, postal address, email address, and date of birth. This information will be used to help us detect potential fraud, verify your identity, and fulfill and respond to your request. Upon receiving a CCPA request, we may call you using the phone number you provide to request additional information (such as your Social Security Number if you are requesting to know the specific pieces of personal information we have collected about you) to further verify your identity and answer a few authentication questions required by the third-party identity verification service we use to assist in this process. We will not store or use this information for any other purpose.

If you decide to designate an authorized agent (other than through power of attorney) to submit a CCPA request on your behalf, we require that you provide the authorized agent written permission to do so and verify your own identity through the process described in the paragraph above. We also require the authorized agent to submit proof that you have authorized them to act on your behalf.

\*The New York Life Family of Companies (also referred to as "we," "our," or "us" throughout this Privacy Notice) currently includes the following affiliates and funds:

- New York Life Insurance Company
- New York Life Insurance and Annuity Corporation
- New York Life Investment Management LLC
- New York Life Enterprises LLC
- New York Life Group Insurance Company of NY
- New York Life Investment Management Asia Limited
- New York Life Trust Company
- Andera Partners
- Apogem Capital LLC
- Ausbil Investment Management Limited
- Bow River Advisors LLC
- Candriam S.C.A.
- Eagle Strategies LLC
- Flatiron RR LLC, Manager Series
- Kartesia Management SA
- Life Insurance Company of North America
- MacKay Shields LLC
- NYLI Active ETF Trust
- NYLI CBRE Global Infrastructure Megatrends Term Fund
- NYLI ETF Trust
- NYLI Funds Trust
- NYLI MacKay DefinedTerm Municipal Opportunities Fund
- NYLI MacKay Muni Opportunities Fund

NYLI VP Funds Trust  
NYL Investors LLC  
NYLIFE Distributors LLC  
NYLIFE Insurance Company of Arizona  
NYLIFE Securities LLC  
NYLIM Service Company LLC  
NYLINK Insurance Agencies, Inc.  
NYL Investments Europe Limited  
NYL Investments UK LLP  
Tristan Capital Partners