

Ethos Privacy Policy

Effective Date: June 1, 2024

Ethos Technologies Inc. and our subsidiaries and affiliates ("Ethos") provide life insurance, estate planning and related products and services. Our customers, employees, and business partners provide personal information to Ethos everyday. They rely on Ethos to protect that information, as well as to respect their privacy. As part of Ethos's commitment to meeting these expectations and to transparency, this Privacy Policy describes Ethos's collection and handling of personal information.

This Privacy Policy describes how Ethos processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy, including as applicable, our websites, mobile application, and social media pages (collectively, the "Service") as well as our marketing activities, live events and other activities described in this Privacy Policy.

Ethos may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information. For example, information we collect from customers or consumers that have, used to have, or have sought a financial product or service from us is subject to the [Ethos Consumer Privacy Notice](#). If there is any conflict or inconsistency between this Privacy Policy and the Ethos Consumer Privacy Notice with respect to information we collect from such customers or consumers, the Ethos Consumer Privacy Notice shall control to the extent of any such conflict or inconsistency. Additionally, if you are a life insurance agent who wants to partner with Ethos, our [Agent Privacy Notice](#) applies to the information that we collect about you.

Please click [here](#) to view the previous version of our Privacy Policy.

1. Personal information we collect

1. Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:
 - Contact data, such as your first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
 - Profile data, such as the username and password that you may set to establish an online account on the Service, redemption code, biographical details, photograph or picture, links to your profiles on social networks,

interests, preferences, information about your participation in our contests, promotions, or surveys, and any other information that you add to your account profile.

- Communications data and related recordings based on our exchanges with you, including when you contact us through the Service, call us, communicate with us via chat or chatbot features or video, social media, or otherwise. By communicating or otherwise interacting with us, you acknowledge your communication(s) or interaction(s) may be overheard, monitored, and/or recorded without further notice or warning by us or third parties.
- Transactional data, such as information relating to or needed to complete your orders on or through the Service, including order numbers and transaction history.
- Marketing data, such as your preferences for receiving our marketing communications and details about your engagement with them.
- User-generated content data, such as photos, images, music, videos, comments, questions, messages, works of authorship, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- Personal history data, such as familial (including household) and other relationship information, date and place of birth, degrees and level of education, occupation, title, employer, employment history, information about your personal and professional associations, criminal history, motor vehicle records, national origin, citizenship, nationality, marital status, sex, and veteran or military status.
- Health data. This includes your general health status, medical history, family medical history, diagnosis, treatment, prescription and other medical information, information regarding mental illness, alcohol use, drug use and/or nicotine use, height, weight, health insurance information, and other health data.
- Financial data. This includes credit report information (also known as consumer report or background check data), credit based insurance scores, bank account number and routing number, transaction information, financial account information (including statements and checks), payment card numbers, account information about externally linked accounts,

account login credentials you use to access our Service, household income data, tax documents, insurance policy number(s), existing or past life insurance coverage, your authority over financial accounts (including trusted contact(s)/beneficial interest in and other information about entities with whom you are associated), public company affiliations, source of wealth information, net worth, and other financial information.

- Government-issued identification data. This includes Social Security number, tax-identification number, passport number, state or local identification number (for example, driver's license or state identification number), alien registration number, and copies (including images) of relevant government-issued identifications.
 - Promotion data. This includes information you share when you enter a competition, promotion or complete a survey. Please note that if you participate in a sweepstakes, contest or giveaway through the Service, we may ask you for your contact data to notify you if you win or not, to verify your identity, determine your eligibility, and/or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstakes and contest that you enter.
 - Inferential data. This includes inferences drawn regarding, or a profile reflecting, your preferences, characteristics, predispositions, behavior, attitudes, creditworthiness, and insurability profile.
 - Other data not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.
2. Third-party sources. We may combine personal information we receive from you with personal information that we obtain from other sources, such as:
- Affiliates
 - Publicly-available sources, such as government agencies, public records, social media platforms, websites and other publicly available sources.
 - Consumer reporting agencies
 - Healthcare services, such as healthcare providers, medical institutions and health information exchanges.
 - Data providers, such as information services and data licensors.
 - Service partners, such as insurance agents, brokerages, carriers, insurance producers, referral partners, and any other entities or individuals that facilitate or are involved with your application for, or purchase of, our insurance or estate planning products or services or that direct you to our Service.

- Business and marketing providers, such as marketing firms and third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.
 - Customers, such as when our customers or prospective customers provide information concerning beneficiaries, family members or other third parties.
 - Service providers that provide services on our behalf or help us operate the Service or our business.
 - Business transaction partners. We may receive personal information in connection with an actual or prospective business transaction. For example, we may receive your personal information from an entity we acquire or are acquired by, a successor, or assignee or any party involved in a business transaction such as a merger, acquisition, sale of assets, or similar transaction, and/or in the context of an insolvency, bankruptcy, or receivership.
 - Third-party services, such as social media services, that you use to log into, or otherwise link to or integrate with, your Service account. This data may include your username, profile picture, posts and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.
3. Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:
- Device data, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
 - Online activity data, such as pages or screens you viewed, information you input into any such page or screen (which may include any of the categories of personal information in this [Personal information we collect](#) section of the Privacy Policy), how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

- Location data. This includes your zip code and other information about your location and your mobile device including a unique identifier for your device; in addition, in some instances, location information can be estimated from your IP address or through your wireless signal.
 - Communication interaction data, such as your interactions with our email, text or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.
4. For more information concerning our automatic collection of data, please see the [Tracking technologies](#) section below.
 5. Data about others. This includes information regarding beneficiaries, family and household members, and other third parties whose personal information our customers or prospective customers may provide to us. Additionally, we may offer features that help individuals invite their family, friends or other contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their personal information with us unless you have their permission to do so.

2. Tracking Technologies

Cookies and other technologies. Some of our automatic data collection is facilitated by cookies and other technologies. For more information, see our [Cookies and Other Tracking Technologies Notice](#).

3. How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

1. Service delivery and operations. We may use your personal information to:
 - Provide the Service, including establishing and maintaining your user profile, underwriting your life insurance application, administering claims and coverage, and providing estate planning services;
 - Enable security features of the Service;
 - Facilitate your invitations to friends who you want to invite to join the Service;
 - Communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
 - Communicate with you about events or contests in which you participate; and

- provide support for the Service, and respond to your requests, questions and feedback.
2. Service personalization, which may include using your personal information to:
 - Understand your needs and interests;
 - Personalize your experience with the Service and our Service-related communications; and
 - Remember your selections and preferences as you navigate webpages.
 3. Machine learning, analytics and other Service analysis and improvement. We may use your personal information to analyze and improve the Service and to develop new products and services. For example, we may process your personal information through our own or third-party artificial intelligence (“AI”) tools and may use your personal information to train and develop AI models and for other machine-learning purposes (including for purposes of marketing, sales outreach, content generation, customer communications, underwriting efficiency, and predictive modeling). We may also use your personal information to analyze your usage of the Service and to help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails. For more information on analytics, see our [Cookies and Other Tracking Technologies Notice](#).
 4. Marketing and advertising. We, our service providers, insurance agents with whom we partner, and our third-party advertising partners may collect, receive and use your personal information for marketing and advertising purposes. For example:
 - Marketing. To send you marketing communications and to personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
 - Interest-based advertising. We and our third-party advertising partners may use cookies and other technologies to collect information about your interaction (including the data described in the [automatic data collection](#) section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the Your choices section of our [Cookies and Other Tracking Technologies Notice](#).
 5. Events, promotions and contests. We may use your personal information to:
 - Administer promotions and contests

- Communicate with you about promotions or contests in which you participate
 - Contact or market to you after collecting your personal information at an event
6. Compliance and protection. We may use your personal information to:
 - Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
 - Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
 - Audit our internal processes for compliance with legal and contractual requirements or our internal policies;
 - Enforce the terms and conditions that govern the Service; and
 - Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.
 7. Data sharing in the context of corporate events. We may share certain personal information in the context of actual or prospective corporate events – for more information, see [How we share your personal information](#), below.
 8. To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.
 9. We may choose to disclose nonpublic personal information about you, the consumer, to a third party for compensation.
 10. Further uses, in some cases, we may use your personal information for further uses, in which case we will ask for your consent to use your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

4. Retention

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period(s) for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for

which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

5. How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection. We may not have control over how these parties handle your personal information.

1. **Affiliates.** We may share personal information with members of the Ethos family of companies (for example, our corporate parent, subsidiaries, and affiliates).
2. **Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, identity verification, fraud prevention, risk management, information technology, customer support, online chat functionality providers, email delivery, marketing, consumer research, machine learning and website analytics).
3. **Payment processors.** Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Stripe. Stripe may use your payment data in accordance with its privacy policy, <https://stripe.com/privacy>. You may also sign up to be billed by your mobile communications provider, who may use your payment data in accordance with their privacy policies.
4. **Consumer reporting agencies.** We may share personal information with consumer reporting agencies (such as credit reporting agencies, MIB Group, Inc. (and its affiliated entities) and other similar entities). Information obtained from a consumer reporting agency or insurance support organization may be retained by such entity and disclosed to other persons.
5. **Healthcare services,** such as healthcare providers, medical institutions and health information exchanges as needed to analyze and/or verify insurance coverage or benefits, inform you of a medical issue of which you may not be aware, and/or as a part of an operations or services audit to verify you have been treated by the medical institution.
6. **Service and Marketing Partners,** such as insurance agents, brokerages, carriers, insurance producers, referral partners, any other entities or individuals that facilitate your purchase of our insurance products or estate planning services or direct you to our Service, as well as marketing partners, including third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Note that we may share your personal information with select third parties, including insurance agents, for them to market our products and services as well as their own or third-party products and services.

7. Advertising partners. Third-party advertising companies for the [interest-based advertising purposes](#) described above.
8. Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so. For example, we may share your personal information with your authorized representatives, agents and beneficiaries.
9. Analytics and machine learning providers. We may share certain personal information with third-party analytics and AI/machine learning platforms.
10. Linked third-party services. If you log into the Service with or otherwise link to or integrate your Service account with a social media or other third-party service, or are logged into a social media or third-party service when you visit our Service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.
11. Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.
12. Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.
13. Business transferees. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Ethos, financing of Ethos, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Ethos as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.
14. Other users and the public. We may share certain of your personal information (for example, your feedback regarding our products and/or Service) to other users of the Service and the public. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information.

We make commercially reasonable efforts to verify that the parties with whom our Service shares personal information provide a level of protection of personal information consistent with the practices described in this Privacy Policy, except that all such parties described above other than service providers and affiliates may, to the extent permitted by law, use personal information as described in their own privacy policies.

6. Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California can find additional information about their rights in the [California privacy](#) section, below.

1. Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.
2. Opt-out of Ethos marketing communications. You may opt-out of Ethos marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

If you receive marketing text and/or SMS messages from us, you may opt out of receiving further marketing text and/or SMS messages from us by replying STOP to our marketing message.

1. Cookies and other technologies. For information about cookies and other technologies employed by the Service and how to control them, see our [Cookies and Other Tracking Technologies Notice](#).
2. Blocking images/clear gifs. Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.
3. Advertising choices. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:
 - Browser settings. Changing your internet web browser settings to block third-party cookies.
 - Privacy browsers/plugin-ins. Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
 - Platform settings. Certain platforms offer opt-out features that let you opt-out of use of your information for interest-based advertising. For example, you may be able to exercise that option for Google and Facebook, respectively, at the following websites:

- i. Google: <https://adssettings.google.com/>
 - ii. Facebook: <https://www.facebook.com/about/ads>
- Ad industry tools. Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - i. Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - ii. Digital Advertising Alliance: optout.aboutads.info.
 - iii. AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- Mobile settings. Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

1. Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to all “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.
2. Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.
3. Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.
4. Delete your content or close your account. You can choose to delete certain content through your account. If you wish to request to close your account, please [contact us](#). If you are a policyholder for an insurance product or service, please follow the cancellation or termination provisions in your policy.

7. California privacy

Because Ethos is a “financial institution” as defined by the Gramm-Leach-Bliley Act (“GLBA”), Ethos data generally falls within the GLBA exemption to the California Consumer Privacy Act (“CCPA”). Independent of the application of the CCPA, where consistent with law, Ethos may offer California residents the following rights with respect to certain personal information (which, for purposes of this [California privacy](#) section of the Privacy Policy shall mean “personal information” as defined under the CCPA). Ethos may, and reserves the right to, decline your request consistent with applicable law.

1. California requests:

- Information. You may request the following information about how we have collected and used your personal information during the past 12 months:
 - i. The categories of personal information that we have collected.
 - ii. The categories of sources from which we collected personal information.
 - iii. The business or commercial purpose for collecting and/or selling or sharing personal information.
 - iv. The categories of third parties to whom we disclose personal information.
 - v. The categories of personal information that we sold or disclosed or shared for a business purpose.
 - vi. The categories of third parties to whom the personal information was sold, shared or disclosed for a business purpose.
- Access. You may request a copy of the specific pieces of personal information that we have collected about you.
- Deletion. You may ask us to delete certain personal information that we have collected from you.
- Correction. You may ask us to correct inaccurate personal information that we have collected about you.
- Opt-out of sales. You may ask us not to “sell” or “share” (as those terms are defined under the CCPA) personal information we have collected about you to or with third parties now or in the future.
- Nondiscrimination. You may exercise the rights described above free from discrimination as prohibited by the CCPA.

2. Exercising your right to information, access, deletion and correction. You may submit requests to exercise your right to information, access, deletion or correction by emailing us at privacy@getethos.com or filling out our [webform](#).

3. Exercising your right to opt-out of the “sale” or “sharing” of your personal information. Like many companies, we use services that help deliver targeted ads to you. California law may classify the use of some of these services as “selling” or “sharing” your personal information with the advertising partners that provide the services. You can submit requests to opt-out of tracking for targeted

advertising purposes or other sales of personal information via phone by calling (415) 915-0665, by clicking here: [Do Not Sell or Share My Personal Information](#), or by broadcasting the global privacy control signal. To download and use a browser supporting the GPC browser signal, click here:

<https://globalprivacycontrol.org/orgs>. You will need to turn the GPC signal on for each supported browser or browser extension you use.

4. Verification of identity; authorized agents. We will need to verify your identity to process your information, access, deletion and correction requests and reserve the right to confirm your California residency. We will need to verify your identity before processing your request, which may require us to request additional personal information from you, such as asking you about your residency, requesting government identification or a declaration under penalty of perjury or other information. We will only use personal information provided in connection with a consumer rights request to review and comply with the request.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

8. Confidentiality practices for victims of domestic abuse

Where an individual has been a victim of domestic violence or abuse, Ethos understands that their confidential information may require additional sensitivity, including the home address, phone number, or place of employment. If you are an Ethos applicant, policyowner, insured or beneficiary, who has been a victim of domestic violence or other abuse, and would like Ethos to take steps to further safeguard your information from others or need to remove a previously submitted request, please contact us at privacy@getethos.com, and we will assist you. Ethos provides the victim a right of access and correction with respect to all confidential abuse information received about such individual. Please note that confidential abuse status is never a basis for

denying, refusing to issue, renewing, reissuing, canceling, or otherwise terminating a policy, restricting or excluding coverage or benefits of a policy, or charging a higher premium for a policy. For residents of New Mexico, please note that the full notice prescribed in 13.7.5.8 NMAC is available to you by contacting privacy@getethos.com.

9. Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

10. Security

We employ reasonable technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies. We cannot guarantee the security of your personal information. Please visit our [Data Security webpage](#) to learn more about our efforts designed to protect your personal information.

11. International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

12. Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

13. Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance that the modified Privacy Policy applies to your interactions with the Service and our business.

14. How to contact us

- Email: privacy@getethos.com
- Mail: 1606 Headway Circle, #9013, Austin, TX 78754
- Phone: 415-915-0665