

## PRIVACY NOTICE

The Great-West Family of Companies protects your privacy. We have policies to keep your nonpublic personal information private. We may share it with affiliates and third parties that we do business with, and in other ways permitted by law.

*The Great-West Family of Companies includes:*

Great-West Life & Annuity Insurance Company  
The Great-West Life Assurance Company (US operations)  
Great-West Life & Annuity Insurance Company of New York  
Great-West Financial Retirement Plan Services, LLC  
Advised Assets Group, LLC  
GWFS Equities, Inc.<sup>‡</sup>  
The Canada Life Assurance Company (US operations)  
Emjay Corporation  
Empower Retirement<sup>‡‡</sup>  
FASCore, LLC  
Great-West Life & Annuity Insurance Company of South Carolina  
Great-West Capital Management, LLC  
Great-West Funds, Inc.  
Great-West Trust Company, LLC  
Westkin Properties Ltd.

<sup>‡</sup> GWFS Equities, Inc. is a Member of the Securities Investor Protection Corporation ("SIPC"). You may obtain information about SIPC, including the SIPC brochure at: Securities Investor Protection Corporation  
805 15th Street, N.W. Suite 800 Washington, D.C. 20005-2215  
Email: [asksipc@sipc.org](mailto:asksipc@sipc.org) Tel: (202)371-8300  
Information about SIPC is also available at [www.sipc.org](http://www.sipc.org).

<sup>‡‡</sup> Empower Retirement refers to the products and services offered in the retirement markets by Great-West Life & Annuity Insurance Company, Great-West Life & Annuity Insurance Company of New York, and their subsidiaries and affiliates.

**Our Websites.** When you visit our websites, we may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on the websites. We use this information for a variety of purposes, such as maintaining the security of your online session, online advertising, facilitating site navigation, improving our websites' design and functionalities, and personalizing your experience. Additionally, we use temporary and/or persistent cookies, web beacons and other similar technologies ("cookies") to support the operation of the Great-West Family of Companies' websites.

Cookies are text files that are placed by a client server onto the browser of a visitor to a website. These files are harmless to your computer, and store navigation information as you move throughout the website. These cookies help us to collect information about visitors to our websites. We also use cookies for security purposes and to personalize your experience, such as customizing your screen layout. On their own cookies do not contain or reveal any personally identifiable information. However, if you choose to furnish us with personally identifiable information, this information can be associated with the data collected using the cookies.

The Great-West Family of Companies and third-party service providers we hire may use cookies in online advertising. We do not share personally identifiable information about our customers with these third-party service providers, and they do not collect such information for us. These third-party service providers help us determine which products and services offered by the Great-West Family of Companies may be of interest to you. These service providers may collect information about your activity on our websites using cookies and other technologies to analyze, for example, pages visited, search engine referrals, browsing patterns, and responses to advertisements and promotions. Such service providers may only collect and use such information for purposes specified by us and not for their own purposes. Third-party advertising companies may use these cookies to optimize the placement by the Great-West Family of Companies of our online advertisements on unaffiliated websites. We do not share personally identifiable information about our customers with these third-party service providers, and they do not collect such information for us.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie when accessing one of the Great-West Family of Companies' websites, or if you delete cookies, you may experience some inconvenience in your use of our websites. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences.

**Information We Collect.** We collect and store information. It comes from forms that you complete, when you access our websites, from business you have conducted with us and other parties we do business with, and from consumer and insurance reporting companies.

**Security of Your Information.** We have physical, administrative, and technical safeguards in place to protect your privacy.

**Access to Information.** The only persons who have access to your records are those who need it for business reasons.

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**Our Information Sharing Practices.** We limit the information we share and the parties we share it with. We share your information to help you do business with us. What we share depends on the types of products or services you request. As we are only permitted to share your information in ways described in this notice, the Great-West Family of Companies do not respond to “do not track” signals or similar digital privacy mechanisms. For example, we may share information:

- from business forms that you complete (such as your name, address, SSN, plan or ID number, assets and income from your application)
- about your business with us, or others (such as your policy or contract coverage and benefits and payment history)
- about your relationship with us (such as the products or services you purchased)
- from your employer, benefit plan sponsor, or group product (such as your name, address, SSN, plan or ID number and age)
- from consumer and insurance reporting organizations (such as your credit, financial or health history; please note, these organizations may retain information provided to us and disclose it to others)
- from other third parties (such as health and demographic information)
- from visitors to our websites (such as information you provide online by completing forms, site visit data and “cookies”)

**Sharing of Health Information.** We won't share your health information, unless such sharing is permitted or required by law. For a description of how we share your health information, please contact our Privacy Officer at the address noted below.

**Sharing Information with Other Parties.** You may permit us to share your information with other parties. Your information may be shared without your consent with our affiliates and other third parties if permitted by law. We do not share your information for any purpose that requires an opt-in or opt-out.

Our affiliates are listed and include, but are not limited to, our broker-dealers and our trust company. Your information may be shared to serve you better or to make it easier for you to do business with us.

We may also share your information with vendors and financial institutions. Vendors perform services for us such as processing transactions. Financial institutions such as banks have marketing agreements with us. We have agreements with these parties requiring them to protect the privacy of your information. They are not allowed to use the information other than as specified or permitted by law.

Other disclosures that may be made without your consent include:

- To detect or prevent fraud & other criminal activity;
- To a medical professional for eligibility or audit purposes;
- In response to a question from a government agency;
- For purposes otherwise permitted or required by law;
- In response to a subpoena or court order;
- To a group policy holder to report claims experience or for an audit;
- In connection with a sale or merger of all or part of our business;
- To a government agency to determine your eligibility for benefits they may have to pay for;
- To a peer review committee to evaluate a medical professional;
- To a certificate holder or policyholder to provide information about the status of a transaction.

**Our Treatment of Information about Former Customers.** If our relationship ends, we will not share your information with third parties except as the law requires or permits.

**Access to Information.** You may access your information by submitting a written request that describes the information. We will respond within 30 business days or as required by state law. Our response will explain the nature and substance of the information on record. We will identify, if recorded, the parties we shared your information with over the last 2 years.

**Right to Correct, Amend or Delete Information.** You may submit a written request to us to correct, amend or delete any information in our records. We will respond to your request within 30 business days or as required by state law.

If we agree to your request, we will notify you in writing. We will provide the corrected information to any person you identify that has received the information in the last 2 years and to any insurance reporting organization we may have provided the information to over the last 7 years. If we refuse your request, we will explain why and you will have the right to file a statement of disagreement.

We reserve the right to revise this policy as needed. If changes are made, we'll send you a revised notice and post the new policy on the [www.greatwest.com](http://www.greatwest.com) website.

### Chief Privacy Officer

Great-West Life & Annuity Insurance Company  
8525 East Orchard Road  
Greenwood Village, CO 80111