

Reinsurer Privacy Notice (UK)

We are The Prudential Insurance Company of America (“We”, “Our”, or “Us”), a subsidiary of Prudential Financial, Inc.¹ regulated in the United States and headquartered at 751 Broad Street, Newark, NJ 07102. We reinsure pension and longevity risk for insurers (your “Pension Scheme Insurers”) that have acquired such risks from UK pension scheme trustees (“Trustees”) that provide you with retirement benefits.

As part of our role as reinsurer, the Pension Scheme Insurers and/or Trustees may provide us with personal information about you as a beneficiary of the pension scheme. We are a controller in respect of that information.

Our EEA-based agent, PGIM Ireland, Ltd. (“PGIM Ireland”), acts as our processor. The Pension Scheme Insurers or Trustees may provide PGIM Ireland or Us with one or more of the following categories of personal information about you: Name; Address (including postcode); Gender; Date of Birth; Marital/Civil Partnership Status; pension benefit information.

The Pension Scheme Insurers or Trustees “scrub” your personal information prior to sending it to Us, so that it does not contain any identifiers (“pseudonymised personal information”). We receive a set of Unique Identification Numbers and other information that we need to fulfil our role as reinsurer. We do not use this information to identify you.

We use your pseudonymised personal information to: calculate, update and verify Our actuarial assumptions and pricing for the reinsurance We provide to the Trustees and Pension Scheme Insurers; make payments to your Trustee and Pension Scheme Insurer; develop and refine Our internal underwriting, assumptions setting processes and actuarial models; comply with and enforce applicable legal and regulatory requirements, contractual obligations and Our policies; and to establish or defend legal rights and protect Our operations.

We process your personal information where it is necessary for the purposes of: Our legitimate interests (as described above); compliance with Our legal obligations; arranging, underwriting or administering a reinsurance contract; making a determination in connection with benefits payable under an occupational pension scheme; and/or the prevention or detection of fraud.

We may share your personal information with your Pension Scheme Insurer and Trustee; Our affiliates, agents, external service providers; third parties in connection with a corporate transaction such as a sale of Our businesses; governmental, regulatory or other public authorities as permitted or required by law.

We retain personal information for as long as needed or permitted in light of the purposes for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include whether the purpose for collection still exists, our legal obligations to keep records and where retention is advisable in light of Our legal position.

Your personal information may be stored and processed by Us (or on our behalf) in the UK, the EEA and the United States. We have put in place contractual clauses to protect your pseudonymised personal information if it is transferred to the United States. You may obtain a copy of and review a form of these contractual clauses at <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-data-transfer-agreement-and-guidance/>. If We transfer your personal information

¹ Prudential Financial, Inc. of the United States is not affiliated in any manner with Prudential plc, incorporated in the United Kingdom, or with Prudential Assurance Company, a subsidiary of M&G plc, incorporated in the United Kingdom.

to any other countries, we ensure that adequate protective measures are put in place as required by applicable law.

You can make a request to access, correct, update, delete, object to or opt out of the processing of personal information, or request a copy of your personal information to transmit it to another company. To make such a request, you should contact the Trustee, who will be able to identify and assist you. You may also contact Us at paul.mccarron@pramerica.ie or 00 353 87 091 7981. You have the right to complain to the UK ICO about Our use of your personal information (<https://ico.org.uk>).

This privacy notice is effective as of April 11, 2024.

We reserve the right to change this notice. If we change it, we will post the current privacy notice to this website. Any changes to this notice will be effective as of the day they are posted.