

# Recording Notice to Non-Employees

**LAST UPDATED DATE:** July 2025

This Recording Notice to Non-Employees (the “Notice”) applies to independent contractors, consultants, temporary workers, employees or contractors of a third party (“non-employee”) and does not apply to employees, former employees or job applicants of Prudential Financial, Inc. and its subsidiaries and affiliates (“Prudential”). Prudential (“we” or “us”) respects your privacy, and we are committed to protecting your personal information. This Notice is designed to inform non-employees (“you” or “your”) about how we may collect, use, share, retain and disclose personal information collected from you or about you in the context of recorded business meetings, as outlined within the Recording in the Workplace Standards (found in the Digital Communications and Acceptable Use Policy). It also outlines your choices. This includes any use of voice-to-text conversion technologies employed by Prudential to transcribe spoken content. These tools automatically convert speech to text, and when configured, they may create transcriptions for business, compliance, or operational purposes.

## How We Collect Personal Information

Business meetings may sometimes be recorded by Prudential to enhance knowledge sharing in a collaborative online environment.

Depending on how the meeting is held, this may include (i) the name of the attendee, (ii) the recording of voice, (iii) photo and/or (iv) video of the attendee. Information captured during the recording is considered Personal Information, as defined in the Personal Information Protection Notice for Non-Employees and data protection laws. Personal Information in recordings could include images of you (e.g., your webcam footage) or audio of comments you make or content you provide to any chat function. In addition to standard audio and video recording, we may use voice-to-text technology to transcribe spoken content in real time. This may include the use of automated speech recognition (ASR) or AI transcription tools.

This Notice augments the Systems and Data Access Agreement for Non-Employees and the Personal Information Protection Notice for Non-Employees and explains how the recordings will be used by Prudential. Consistent with applicable law, the legal basis for processing this Personal Information generally is legitimate interest. This applies when the processing is: (i) not required by law but is of a clear benefit to Prudential or the individual, (ii) there is limited privacy impact on you as the individual; and (iii) we think you would reasonably expect us to use the Personal Information in the way that we do. You also always have a choice - If you do not want to be recorded you can mute your microphone, turn off your webcam and/or choose not to attend or to not contribute during the meeting.

# How We Use Personal Information

The recordings, including any transcriptions generated through voice-to-text technologies, may be used by Prudential to enable meeting participants and non-attendees to share knowledge within the organization and to capture the details of a meeting for use after the meeting is over. These recordings and transcriptions will be used and protected consistent with Prudential's Global Privacy Policy and will be hosted in Prudential-approved environments. Additional forms of text-to-speech conversion can be enabled by the user to dictate requests for use within approved technology.

We retain personal information, in compliance with our records retention policies and for as long as needed based on the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide you with the products and services you request;
- Whether there is a legal obligation we are subject to (for example, certain laws require us to keep records of certain transactions for a certain period of time before we can delete them,
- If there is a contractual obligation, we are subject to; or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

# How Recordings Are Accessed

The recordings, including any transcriptions generated through voice-to-text technologies, may be made available via Prudential Systems, such as SharePoint, depending on the purpose of the recording and who needs to have access to it. Recorded meetings and associated transcriptions must be viewed on approved devices in settings that respect the non-public nature of meeting content. Downloading, duplicating, or editing a recording or its transcription may be conducted only in limited circumstances where consistent with job duties.

**“Prudential Systems”** shall mean broadly any kind of digital communication system used by Prudential. This term is intended to include any new technology, form of communication, or use that may be developed or acquired in the future for digital communications for Prudential business activities. This includes, but is not limited to, the following:

- Prudential-owned or leased computers, desktops, laptops, mobile and other devices.
- Infrastructure such as networks, servers, routers and data storage devices and media.
- Communication systems (including those owned, leased, or licensed by Prudential and User's personal devices when used to access or send digital communications or Prudential Information on Prudential Systems) that use software managed by Prudential. Examples of communications include but are not limited to: communications sent through electronic messaging applications, telephone calls, Microsoft Teams' meetings including those using transcription or voice-to-text technologies), e-mail and attachments, collaboration tools, instant messages, text messages and social media posts.

- Any environment, application, and/or infrastructure, including cloud-based, authorized or provided by Prudential for any purpose, including production, quality assurance or testing.

## Changes to this Notice

Prudential reserves the right to modify, add or remove portions of this notice at any time. If we decide to change this notice, we will post the updated Notice on the Prudential Vendor Code of Conduct and Terms of Engagement site found at [www.prudential.com/links/about/vendor-engagements](http://www.prudential.com/links/about/vendor-engagements).

## Contact Us

As always you may access data subject rights requests and manage your privacy preferences via specific links in our [Prudential Privacy Center](#) or [PGIM Privacy Center](#).

If you have questions regarding Data Subject Rights or privacy in general, please contact [global.privacy@prudential.com](mailto:global.privacy@prudential.com).