

Privacy Notice

We Take Important Steps to Protect the Nonpublic Personal Information We Collect About You

Dear Customer:

This privacy notice informs you how we collect, share and protect nonpublic personal information (“NPI”) which you give us or which we obtain in connection with providing our financial products and services. It presents the privacy practices of Global Atlantic Financial Group Limited and its subsidiaries, including Accordia Life and Annuity Company, Commonwealth Annuity and Life Insurance Company, First Allmerica Financial Life Insurance Company, Forethought Life Insurance Company and Global Atlantic Re Limited (the “Global Atlantic Companies”). Please read this notice carefully to understand what we do to ensure the privacy and security of your NPI.

UNDERSTANDING HOW GLOBAL ATLANTIC USES YOUR PERSONAL INFORMATION	
Why are you receiving this Notice?	Financial institutions choose how they share your NPI. Federal and state law gives consumers the right to limit some but not all sharing of that information. Federal law also requires us to tell you how we collect, share and safeguard your NPI. You are receiving this Privacy Notice because our records show either that you are a customer who is obtaining or has obtained insurance coverage or non-insurance products or services.
What types of Information do we collect?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and name, address, and date of birth • assets and income • wire transfer instructions and financial information <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
What do we do with the NPI we collect?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Global Atlantic chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Global Atlantic share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	No	We don’t share
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We don’t share
For nonaffiliates to market to you	No	We don’t share

Questions?	Visit us at globalatlantic.com or e-mail us at privacy@gafg.com
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Who we are

Who is providing this notice?	Companies owned by Global Atlantic Financial Group Limited, which includes its subsidiaries, Accordia Life and Annuity Company, Commonwealth Annuity and Life Insurance Company, First Allmerica Financial Life Insurance Company, Forethought Life Insurance Company and Global Atlantic Re Limited (the "Global Atlantic Companies").
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What we do

How does Global Atlantic protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Global Atlantic collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • apply for a financial product • request additional services • update your contact or account information <p>Depending on your product we may also collect your personal information from other companies under certain circumstances.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

Everyday business purposes	<p>The actions necessary for financial companies like the Company to conduct business and manage customer accounts, such as:</p> <ul style="list-style-type: none"> • Processing transactions; • Administering insurance coverage, product, services or claims; • Protecting against fraud; • Responding to court/governmental orders or subpoenas and legal investigations; and • Responding to insurance regulatory authorities.
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Affiliates are companies owned by Global Atlantic Financial Group Limited, which includes subsidiaries.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Global Atlantic and its subsidiaries do not share information with nonaffiliates
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Global Atlantic and its subsidiaries do not engage in joint marketing

Other important information

Under certain circumstances, Global Atlantic may collect or receive certain medical information. This medical information is used only to serve your policy and not for any marketing purposes. We do not share medical information without your authorization or unless permitted by law.

You may review and obtain a copy of certain personal information we have about you by writing to us at 20 Guest Street, Boston, MA 02135 or emailing privacy@gafg.com. Please provide your name, address, contract number and the specific information you are requesting. You can ask us to update or change personal information you believe is in error. If we agree, we will change it. However, if we do not agree, we will notify you and permit you to file a written statement which we will include if/when we disclose your personal information to a third party.

Effective Date: This notice is effective as of December 31, 2020.