

# Privacy Compliance Program

Adopted March 26, 2021

*The following is a synopsis of MetLife's Global Privacy policy and program.*

MetLife, Inc. operates worldwide through subsidiaries, affiliates, branches, and joint ventures (collectively "MetLife" or the "Company"). Customers, employees, and business partners around the world provide the Company with personal information every day in order to conduct its global operations. The Company is firmly committed to responsible use of personal information, respecting individual privacy rights, and collecting, using, processing, protecting, and disclosing personal information only in compliance with applicable laws and regulations.

MetLife maintains a Global Privacy Policy (the "Policy"), which establishes enterprise-wide principles and global minimum standards designed to facilitate compliance with applicable privacy laws and regulations, including the European Union's General Data Protection Regulation (GDPR), the United States' Health Insurance Portability and Accountability Act (HIPAA), the California Consumer Privacy Act (CCPA), and other applicable laws and regulations relating to the protection of personal information. The Policy includes requirements to:

- (i) Limit the amount of personal information collected and processed;
- (ii) Provide individuals notice about the use and purpose for collecting personal information, and where legally required, obtaining advance consent;
- (iii) Conduct due diligence and ongoing monitoring of the Company's third parties;
- (iv) Ensure that the cross-border transfer of personal information is compliant with governing laws and regulations; and,
- (v) Incorporate the protection of personal information in the development of business solutions.

The Company's Global Privacy Program (the "Program") is designed to implement the Policy's requirements and provide a globally consistent system of controls to identify and mitigate privacy risk and comply with applicable privacy laws and regulations. Key components of the Program include:

- (i) Designation of a Chief Privacy Officer and establishment of the MetLife Corporate Privacy Office ("MCPO") to oversee the design, implementation and adherence to the Policy and the Program;
- (ii) Strategic enterprise-wide training and awareness, including targeted training;
- (iii) Programs that identify and investigate potential data breaches and notify regulators and/or individuals, as required;
- (iv) Privacy risk assessments; and,
- (v) Independent audit and compliance testing to review and assess compliance with the Program and applicable laws.

The Policy and Program illustrate the Company's commitment to be a trusted steward of personal information and the protection of individual privacy rights. We evaluate our existing policies, procedures, training and technologies as necessary, to address the changing environment.