



## Privacy Notice for European Residents

### Our Privacy Commitment to You

John Hancock respects your privacy. Your trust is one of our most valuable assets. One way we hope to keep your trust is by properly protecting your personal information.

### What Does This Notice Cover?

This Notice is intended for customers, clients, participants, advisors and other business partners of ours who are European residents. It briefly describes how we collect personal information about you, how we use and share it, your rights under the General Data Protection Regulation (“the Regulation”), and how you can contact us about them. More detail, including how we use data collected from visitors to our websites and users of our mobile applications, is available at [www.johnhancock.com/privacysecurity.html](http://www.johnhancock.com/privacysecurity.html).

### Who We Are

When we refer to “John Hancock”, “us”, “our”, or “we” in this Notice, we mean John Hancock Life Insurance Company (U.S.A.) and its subsidiaries and affiliate companies. In most situations, John Hancock is a *Data Controller*, which means we are responsible for decisions about how your personal information is collected, used, and disclosed. In others, John Hancock may also be a *Data Processor* acting on behalf of another entity.

Our Chief Privacy Officer oversees how we collect, use, share and protect your information to ensure your rights are protected. If you have questions about this Notice, your rights, or to make a complaint, please contact:

John Hancock Chief Privacy Officer  
U.S. Compliance Department  
200 Berkeley Street  
Boston, Massachusetts 02216, USA  
Email Address: [privacyquestions@jhancock.com](mailto:privacyquestions@jhancock.com)

### What Personal Information Do We Collect and Why?

The type of information we collect varies and depends on your relationship with us, and the contract, agreement, product or service you have with us.

Collecting personal information about you helps us serve you, communicate with you, provide relevant products and services, and improve the administration of our business.

To collect, use and process your personal information, we rely on one or more of the following lawful bases permitted by the Regulation:

- where we need to perform a contract or agreement you have entered with us,
- where it is necessary for our legitimate interests (such as the operation of our business and to comply with our legal duties or regulatory obligations),
- for the protection of your vital interests (e.g. confirm your identity, prevent fraud, etc.),
- for the performance of a task carried out in the public interest,
- your consent (if needed in certain circumstances).

We obtain personal information from you when you submit an application, enrollment or other similar forms, as well as from transactions and other interactions with you. This information includes:

- Personal data. Name, address, email address, telephone number, date of birth, Social Security number, and citizenship,
- Financial data. Income, assets, banking information, and investment preferences,
- Health data. Medical, and health-related information and habits,
- Interaction data. Data collected when you visit or use our websites, mobile applications, and social media sites.

We will sometimes record telephone conversations and we will let you know when we do this. Our websites use 'cookies' and similar technology. A cookie is a small text file placed on your device when you visit our websites. They help us make the sites work better for you, diagnose technical problems, and for security purposes. We also utilize cookies for certain advertising and marketing purposes and to monitor responses to some of our advertisements and electronic communications.

We may also obtain information from third parties and publicly available sources, such as: your insurance agent, broker, registered representative or financial advisor, employer, consumer reporting agencies, medical providers, data service providers, social media services, business partners, and insurance support agencies (such as the Medical Information Bureau, Inc.).

Generally, we do not rely on your consent as a lawful basis for processing your personal information except should we need to obtain sensitive personal information (such as medical or biometric data).

If you do not provide the personal information we need (or help us keep it up to date when requested), we may not be able to continue to perform all or part of the contract we entered with you, continue to provide you with our products and services, or be able to comply with our legal and regulatory obligations.

### **How Do We Use and Share the Personal Information We Have Collected About You?**

All financial services companies need to use and share customers' personal information in order to provide services to them. We use your personal information mainly to communicate with you, complete transactions that you have requested or authorized, administer your policy or account, and to make you aware of additional products and services that we offer.

As permitted or required by law, your personal information may be shared:

- with employees and associates when their jobs require it to process and service your contracts, benefits, or accounts,
- with your financial advisor, representative, or firm in order for them to service your policy or account,
- with third parties that perform services on our behalf. They are required to have information protection safeguards in place. They are contractually bound to use your information only to perform those services. They are not permitted to use or disclose your information for their own marketing purposes,
- with companies from which we purchase reinsurance coverage,
- to conduct routine or required activities such as audits and tax filings,
- to participate in research studies or to conduct surveys,
- in response to subpoenas and court orders, or to comply with legal requests made by law enforcement and regulatory authorities.

We will use your personal information only for the purposes for which it was obtained, unless we reasonably consider that we need to use it for another purpose which is compatible with the original purpose for which you provided it to us. If we need to use your personal data for a purpose that is unrelated to the original purpose for which you provided it to us, we will notify you and explain the legal basis which allows us to do so.

We will not sell to or share your information with any unaffiliated company for the purpose of that company marketing its own products or services directly to you.

### **How Do We Protect the Personal Information We Have Collected About You?**

We have administrative, physical, and technical safeguards in place that are intended to protect your personal information. Our employees respect your personal information and are trained to keep it safe. You should be aware that we will never ask for your personal information (such as account numbers, social security numbers, or passwords) through an unsolicited email or phone call.

### **How Long Do We Retain Your Personal Information?**

The length of time we retain personal information depends on your relationship with us. If you are a customer, for example, we will retain your personal information for ten years from the date your account is closed, policy surrendered or other relationship ends, unless a longer retention period is required by law. We need to retain it to meet regulatory oversight, tax laws, and other legal obligations to which we are subject in the United States. We will assess and, where appropriate, securely delete it to ensure it not retained for longer than reasonably necessary.

### **Processing of Your Personal Information Outside Europe**

John Hancock's data centers, websites and applications are hosted in the United States and Canada. Your personal information will be processed outside of the European Economic Area (EEA), subject to contractual restrictions regarding confidentiality and security in accordance with applicable data protection laws and regulations. We will not disclose your personal information to third parties who are not authorized to process them. We have administrative, physical, and technical safeguards in place that are intended to protect it and help ensure it receives an adequate level of protection as it does in the EEA.

## **Your Rights**

You have rights which you can exercise in relation to the personal information we hold about you in certain circumstances to:

- Request a copy of your personal information (access) and further details about its processing,
- Request an update or correction (rectification) to it,
- Request its deletion (erasure) under certain conditions,
- Request a restriction on its processing,
- Object to our processing, and
- Request the transfer of your personal information to another person or entity.

If you want to exercise one of these rights please contact us in writing.

## **Making a Complaint**

If you have a complaint about our use of your personal information, please let us know by contacting our Customer Call Centers by telephone, or submit your concern in writing or by email to our Chief Privacy Officer at the address show in the beginning of this Notice.

While we would appreciate the opportunity to address your concern first, you also have the right to make a complaint at any time to the appropriate Data Protection Authority in your country of residence.

## **Changes to this Notice**

This Notice is effective as of May 25, 2018. We may make changes to it from time to time. You can always find an up-to-date version on our website or can contact us for a copy.