

# Supplemental General Data Protection Regulation (GDPR) Privacy Notice



This notice applies to individuals located in the European Economic Area (EEA) only as and to the extent the processing of their personal data by Voya is subject to the GDPR.

Data Processor	Voya processes your personal data on behalf of an EEA organization, most typically EEA based investors.
Categories of personal data we collect	The categories of personal data we collect depend on the relationship your employer has with us, including the product or service your employer has purchased or inquired about. As a business contact of your employer, we may collect the following contact information to interact with you on behalf of your employer: your name, work address, phone number, and email address. If you visit our website, we may collect your Internet Protocol (IP) address, browsing history, search history, and information regarding your interaction with our web sites, applications and advertisements.
Purposes for processing personal data	The business purposes for which we collect personal data include the provision of financial products and services ( <i>e.g., maintaining accounts, processing payments, servicing clients, inform you of our products, services, and events when you subscribe to our newsletter or mailing lists</i> ), auditing client interactions and transactions, detecting security incidents and preventing fraud, identifying and repairing errors that impair functionality, activities to verify or enhance the quality of services, and other internal uses permitted under applicable laws.
Lawful basis for the processing	We process personal data provided by visitors through our website on the basis of consent. We may also process personal data on other bases as permitted by the GDPR and applicable laws, for example, where the processing is in performance of a contract with you or your employer, where it is necessary for our legitimate interests ( <i>or those of a third party</i> ) and your interests and fundamental rights do not override those interests, and where we need to comply with legal obligations.
Recipients of your personal data	All financial companies need to share personal data to run their everyday business. The categories of third parties with which Voya shares the categories of personal data identified above include service providers, third party administrators, brokers, independent agents, plan sponsors, managing general agents, program administrators and affiliates.  <b>To request specific information about the categories of third parties with which Voya has shared your personal data, you may contact us at <a href="mailto:VoyalMGDPR@voya.com">VoyalMGDPR@voya.com</a>. We will respond to your request consistent with applicable law.</b>
International Transfers	The contact information of our business clients will be transferred and stored on Voya servers in the United States of America to comply with legal obligations to which we are subject. Any transfers will be in accordance with this Notice and in compliance with applicable laws. For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your Personal Information. You may obtain a copy of these measures by contacting us as described in the 'For More Information' section below.
Retention	How long we retain personal data varies according to the type of personal data in question and the purpose for which it is collected We will only retain your personal data as long as is reasonably necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you. This does not affect your right to request that we delete your personal data.  In some circumstances we will anonymize your personal data ( <i>so that it can no longer be associated with you</i> ) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

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Individual Rights	Description
<b>Right of Access</b>	Your right to request that Voya provide you access to your personal data that is under our control or on file with us.
<b>Right to Portability</b>	Your right to request that Voya provide you (or a third party you designate) with your personal data in a structured, commonly used and machine-readable format.
<b>Right to Correction (Rectification)</b>	You right to request that Voya correct any incomplete, inaccurate, or outdated personal data held about you, though we may need to verify the accuracy of the new data you provide to us.
<b>Right to Erasure</b>	Your right to request that Voya erase your personal data. Erasure rights may be subject to exceptions and restrictions under applicable law.
<b>Right to Restrict Processing</b>	Your right to request that Voya restrict – or “freeze” – any processing of your personal data that goes beyond merely storing it, for example, when we are processing your request or challenge related to the accuracy of your personal data or the lawfulness of the processing of your personal data and our legitimate interests to process this information, or if you need the personal data for litigation purposes.
<b>Right to Object to Processing</b>	Your right to object to particular uses of your personal data based on your particular situation. Objections are not available for uses of personal data that are required by law or are necessary for Voya to perform contractual obligations.
<b>Right to Withdraw Consent</b>	Where processing your personal data is based on your consent you may withdraw this consent at any time; the withdrawal of the consent shall not affect the lawfulness of processing based on consent before its withdrawal.

<b>To Exercise Your Individual Rights</b>	<p>Contact us at <a href="mailto:VoyalMGDPR@voya.com">VoyalMGDPR@voya.com</a>, or 35 King Street, London EC2V 8EH. We will respond to your request consistent with applicable law. When we receive your request, we will first request additional information to verify your identity before handling your request. You may designate an authorized agent to make a request on your behalf. That agent may be subject to a heightened authentication process. You may also exercise your individual rights with respect to your personal data by logging in to your account online or calling the phone number on your statements or other correspondence. We will respond to all such requests within 30 days of our receipt of the request, absent extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity. We may charge you a reasonable fee for subsequent copies of data that you request.</p> <p>You have the right to file a complaint concerning our processing of your personal data with your national (<i>or in some countries, regional</i>) data protection authority. The EU Commission has a list here: <a href="http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm">http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm</a></p>
<b>For More Information</b>	<p>If you have questions or concerns about Voya's privacy policies and practices, please contact us at:</p> <p>Global Data Protection Office            Attention: Chief Privacy Officer            Voya Financial            5780 Powers Ferry Rd. NW            Atlanta, GA 30327</p>