



U.S. Consumer Privacy Policy for MIM

Last Updated **December 15, 2023**

MetLife Investment Management is MetLife, Inc's ("MetLife") institutional investment management business. MetLife Investment Management ("MIM" or "we") strongly believes in the responsible use of information we collect about individuals. MetLife's US subsidiaries that comprise MIM include MetLife Investment Management, LLC; Raven Capital Management, LLC, MetLife Investments Latin America, MIM I LLC, MetLife Investment Management Europe Limited. This U.S. Consumer Privacy Policy for MIM ("Privacy Policy") describes MIM's privacy practices and is intended to provide certain information to you as required by the California Consumer Privacy Act of 2018, the California Privacy Rights Act of 2022, collectively the ("CCPA") and other similar state consumer data privacy laws.

The purpose of this Privacy Policy is to inform you about our online and offline information practices regarding the collection, (including at initial collection), use, sharing, selling, and retention of your personal information and the rights available to you as a resident of California, Virginia, Colorado, Connecticut, or Utah.

MIM collects personal information in a variety of contexts. For example, we collect personal information relating to individuals who request or obtain our products or services for themselves or a business, visit our locations or facilities, request or enter into transactions or professional relationships for themselves or a business in connection with our investment management business, or are our clients or shareholders. The specific personal information that we collect, use, and disclose will depend on our relationship or interaction with you. For more information about our privacy policies visit <https://investments.metlife.com/privacy-policies/>.

This Privacy Policy does not apply to MetLife employees, contracted personnel, job applicants, or to information collected, processed, or disclosed pursuant to the Gramm-Leach-Bliley Act and implementing regulations, certain insurance laws, or the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

If you are a MetLife employee, contractor, or have applied for a job with us and reside in California please refer to our [Careers Privacy Notice for California residents](#).

Looking for more details?

Personal Information We Collect

MIM collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, to you or a member of your household.

We may have collected the following categories of personal information directly from you or about you in the last twelve (12) months. We do not necessarily collect all examples of personal information listed in a particular category, nor do we collect all categories of personal information for all consumers.

Category	Examples
A. Identifiers	Name, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
B. Personal information in California's Customer Records Statute (Cal. Civ. Code § 1798.80(e))	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, (some personal information included in this category may overlap with other categories.)
C. Characteristics of protected classes under California or federal law	Age, race, national origin, citizenship, religion, marital status, sex (including gender, gender identity, gender expression), sexual orientation, veteran or military status, genetic information.
D. Commercial information	Records of real or personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Biometric information	Fingerprint and/or facial recognition templates.
F. Internet or other electronic network activity information	Browsing history, search history, interaction with web sites, applications, or advertisements.
G. Geolocation data	Geolocation data, such as device location.
H. Audio, electronic, visual, thermal, olfactory, or similar information	Voice recordings, CCTV, photographs, videos.
I. Professional or employment-related information	Salary, compensation, employment status, business titles, business ownership interests.
J. Education information	Certificates / Licenses, grades, disciplinary actions, assessments.
K. Inferences drawn from any of the information identified above	Inferences drawn to create a profile about, for example, an individual's preferences, characteristics, predispositions, behavior, or abilities.
L. Sensitive Personal Information	Social Security number, driver's license, state identification card, or passport number, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation, racial or ethnic origin, citizenship, immigration status, religious or philosophical beliefs, or union membership, the processing of biometric information for the purpose of uniquely identifying a consumer, sex life, sexual orientation.

We may have collected personal information about you from the following categories of sources:

- Directly from consumers (you provide us this information).
- Agents / Brokers / Representatives / Accountants / Financial Advisors.
- Indirectly from you, such as when you participate in a transaction or contractual arrangement.
- Other individual(s) associated with a transaction.
- Consumer Report / Credit Reporting Agencies.
- Court orders or legally binding documents.
- Government agencies or regulators.
- Your financial institution or financial institution related to your business interests.
- From your devices, such as when you visit our websites and mobile applications.
- MIM affiliates.
- Social media platforms.
- Data service providers.

How We Use Personal Information**We may collect your personal information for the following business purposes:**

- Performing business related services, including to process applications, claims, investments, transactions, and to maintain or service accounts.
- Evaluating requested transactions and performing investment analysis or due diligence.
- Conducting and performing contracts, such as executing investment transactions.
- Authenticate your identity.
- Respond to your product or service information requests.
- Provide you with materials that may be of interest, including marketing materials.
- For other everyday business purposes, such as, product development and website administration.
- To establish or defend legal claims and allegations.
- Compliance, legal and regulatory matters, and audits and investigations.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, including money laundering, terrorism, and other crimes.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

We will only use your sensitive personal information for limited permissible business purposes, such as providing you with the services you requested.

Personal Information We Disclose

We may disclose (and may have disclosed during the last twelve (12) months) the following categories of personal information to the following categories of third parties for business purposes:

Category	Examples	Categories of third parties to whom the category of personal information has been disclosed
A. Identifiers	Name, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • Your authorized representatives; • Vendors who provide services to MIM; • Brokers or Agents; • Financial Institutions associated with your account; • Other Companies associated your transaction or account; • MetLife's Reinsurance Partner(s); • Regulators, government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
B. Personal information in California's Customer Records Statute (Cal. Civ. Code § 1798.80(e))	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information (some personal information included in this category may overlap with other categories.)	<ul style="list-style-type: none"> • Your authorized representatives; • Vendors who provide services to MIM; • Brokers or Agents; • Financial Institutions associated with your account; • Other Companies associated your transaction or account; • MetLife's Reinsurance Partner(s); • Regulators, government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
C. Characteristics of protected classes under California or federal law	Age, race, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information.	<ul style="list-style-type: none"> • Your authorized representatives; • Vendors who provide services to MIM; • Brokers or Agents; • Financial Institutions associated with your account; • Other Companies associated your, transaction or account; • MetLife's Reinsurance Partner(s); • Regulators, government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.

D. Commercial information	Records of real or personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Your authorized representatives; • Vendors who provide services to MIM; • Brokers or Agents; • Financial Institutions associated with your account; • Other Companies associated your transaction or account; • MetLife's Reinsurance Partner(s); • Regulators, government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
E. Biometric information	Fingerprints and/or facial recognition templates.	<ul style="list-style-type: none"> • Vendors who provide services to MIM; • Regulators, government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
F. Internet or other electronic network activity information	Browsing history, search history, interaction with web sites, applications, or advertisements.	<ul style="list-style-type: none"> • Vendors who provide services to MIM; • Parties where MIM has obtained your consent or authorization.
G. Geolocation data	Geolocation data, such as device location.	<ul style="list-style-type: none"> • Parties where MIM has obtained your consent or authorization.
H. Audio, electronic, visual, thermal, olfactory, or similar information	Voice recordings, CCTV, photographs, videos.	<ul style="list-style-type: none"> • Vendors who provide services to MIM; • Regulators or government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization;
I. Professional or employment-related information	Salary, compensation, employment status, business titles, business ownership interests.	<ul style="list-style-type: none"> • Vendors who provide services to MIM; • Regulators or government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
J. Education information	Certificates / Licenses, grades, disciplinary actions, assessments.	<ul style="list-style-type: none"> • Vendors who provide services to MIM; • Regulators or government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
K. Inferences drawn from any of the information identified above	Inferences drawn to create a profile about, for example, an individual reflecting their preferences, characteristics, predispositions, behavior, or abilities.	<ul style="list-style-type: none"> • Vendors who provide services to MIM; • Regulators or government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
L. Sensitive Personal Information	Social Security number, driver's license, state identification card,	<ul style="list-style-type: none"> • Your authorized representatives; • Vendors who provide services to MIM;

	<p>or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation, racial or ethnic origin, immigration status, citizenship, religious or philosophical beliefs, or union membership, the processing of biometric information for the purpose of uniquely identifying a consumer, health information, sex life, sexual orientation.</p>	<ul style="list-style-type: none"> • Brokers or Agents; • Financial Institutions associated with your account; • Other Companies associated your, transaction, or account; • MetLife's Reinsurance Partner(s); • Regulators, government agencies or law enforcement; • Parties where MIM has obtained your consent or authorization.
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We do not sell or share your personal information, including your sensitive personal information to non-service provider third parties. We do not sell or share personal information of minors under 16 years of age.

Consumer Privacy Rights

Based on your state of residence, you may have certain privacy rights, subject to exceptions, regarding your personal information, as described below:

- **Right to Know:** You have the right to request what personal information we have collected, used, disclosed, and sold/shared about you during the past twelve (12) months.
- **Right to Delete:** You have the right to request that we delete certain personal information we have collected about you.
- **Right to Correct:** You have the right to request that we correct inaccurate personal information we have about you.

To Submit a Request visit <https://www.metlife.com/privacy-request> or call 1-(888) 282-5758, Monday through Friday, 9:00 a.m. to 9:00 p.m. eastern time, excluding holidays.

To process your request and to help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. We may require you to provide additional personal information to us. If you are making a request on behalf of someone else, we will need to verify that you have the authority to do so.

If you have any questions regarding these rights or would like to appeal a response that you received from us, you can call us at 1-(888) 282-5758. We are available Monday through Friday from 9 a.m. to 9 p.m., eastern time, excluding holidays. You can also email us at MetPrivacy@metlife.com.

Non-Discrimination

MetLife does not discriminate against any individual who exercise their legal rights, such as denying you products and services, charging you different rates or prices, or suggesting or providing a different level of service to you.

Designation of an Authorized Agent

If an authorized agent submits a request to know, a request to correct, or a request to delete on your behalf, we may require that you provide the authorized agent written permission to do so. To designate an authorized agent, please visit <https://www.metlife.com/privacy-request> or call 1-(888) 282-5758.

Retention of Personal Information

MetLife's Global Record Retention Schedule establishes the retention periods for our records consistent with MetLife business needs and global legal and regulatory requirements. Our Information Lifecycle Management Program Office conducts an annual review of the Record Retention Schedule to ensure the Schedule continues to align with global business needs and legal and regulatory requirements. MIM, consequently, will retain personal information only for as long as is necessary for the purpose set out in our policies, for as long as an account or relationship with MIM is active, as needed to provide services to our customers, or to comply with our Global Record Retention Schedule.

Changes to this Privacy Policy

We may change this Privacy Policy from time to time and will post the revised Privacy Policy on this site. When we do, we will let you know by posting the revised Privacy Policy with a new "Last Updated" date. Any changes to this Privacy Policy will become effective when posted unless indicated otherwise.

Contact Us for More Information

If you have questions about our privacy policies and practices or would like to receive this Privacy Policy in an alternative format, call us at 1-(877) 638-7684 or visit <https://investments.metlife.com/privacy-policies/>.

Metrics for Previous Calendar Year (2022)

- MetLife received eight (8) requests to know about what personal information we have collected from California residents in the previous calendar year. We complied in whole with each of these.
- MetLife received five (5) requests to delete information collected from California residents in the previous calendar year. We complied with 1 of these requests in part and we denied 4 of these requests due to applicable exceptions on deletion (for example, if we were required to retain certain information by law or to continue providing requested coverage or services to the individual).
- MetLife received no requests to opt-out of sale of personal information from California residents in the previous calendar year.
- We substantively responded to requests to know within an average of 13 days. We substantively responded to deletion requests within an average of 29 days, which includes any extensions for additional time required to identify and review a requester's data

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