

Please read this notice carefully. It applies to you as a current or former customer of our products and services, or as a consumer interested in our products and services. We at TIAA are committed to protecting your privacy in accordance with the Fair Credit Reporting Act (FCRA), as amended by the Fair and Accurate Credit Transactions Act of 2003 (FACT Act), the Gramm-Leach-Bliley Financial Services Modernization Act (GLBA), applicable state laws and this privacy notice. This privacy notice should not be construed as establishing a contractual relationship.

## Information we may collect

The nonpublic personal information we collect may include, but is not limited to, your name, address, telephone number, email address, Social Security number, date of birth, and your transaction and experience history with TIAA Companies, as defined below. We may use this information in connection with certain aspects of our business. For example, we may use this information to complete your requested transaction, to improve your online experience with us, or to otherwise manage your relationship with the TIAA Companies.

We may obtain this information i) directly from you (e.g., application or other form you have completed, from information you have chosen to disclose in our website, TIAA.org, or from information you have given a TIAA Company in a consultation), ii) from your employer with respect to your employer-sponsored plan, or iii) from third parties. In addition, we may also collect information about your creditworthiness from consumer reporting agencies, and may include your marital status, employment history, income, assets, credit score, credit history, open lines of credit, and about your household.

If you own a life insurance policy, we may have collected your health information. We will not disclose your health information to any other company, including TIAA Companies or other persons unless authorized by you, or required or permitted by law or regulation.

### How your information is used

We use your personal information primarily to provide you with the products and services you request or your employer has directed us to deliver on your behalf, and we share and use your personal information relating to transactions, balances, payment history and similar experiences among the TIAA Companies to conduct their business. If you are a participant in an employer-sponsored retirement or savings plan investing in a TIAA or third-party annuity contract or a TIAA or third-party mutual fund, we may share the information we collect with your employer and its agents, if any, for plan administration purposes. Additionally, unless instructed otherwise by a plan sponsor of your current or former retirement plan, we may also use your personal information to market or determine your possible interest in products and services that the other TIAA Companies offer.

## Disclosure of your information

We share your personal information with other TIAA Companies as permitted by law. We will not disclose your personal information to anyone outside of the TIAA Companies unless: 1) we have received proper consent from you; 2) we are legally permitted to do so; or 3) we reasonably believe, in good faith, that we are legally required to do so. For example, we may provide the information to assist us with various aspects of conducting our business, to comply with laws or industry regulations, and/or to effectuate any action that you have requested, including the following:

- Unaffiliated service providers (e.g., fulfillment companies and securities clearinghouses, data processing services, printers and mailing facilities) engaged by us
- Unaffiliated fund and/or insurance companies and their agents whose investment options are made available to you through your employer-sponsored retirement or savings plan, provided monies are allocated to them on your behalf

- Government agencies, other regulatory bodies and law enforcement officials (e.g., for tax purposes or for reporting suspicious transactions)
- Other organizations, with your consent or as directed by you (e.g., if you use TIAA as a financial reference in applying for credit with another institution)
- Other organizations, as permitted or required by law (e.g., for fraud prevention)

### Security of your information

TIAA protects the personal information you provide against unauthorized access, disclosure, alteration, destruction, loss, or misuse. Your personal information is protected by physical, electronic, and procedural safeguards in accordance with federal and state standards. These safeguards include appropriate procedures for access and use of electronic data, provisions for the secure transmission of sensitive personal information on our website, and telephone system authentication procedures. Additionally, we limit access to your personal information to those TIAA employees and agents who need access in order to offer and provide products or services to you. We also require our service providers to protect your personal information by utilizing the privacy and security safeguards required by law.

## Your right to opt out

Providing us with access to your information permits us to offer you distinct advantages and better service. It enables us to provide you with more comprehensive financial guidance. Sharing and using your information helps us tailor product offerings to you and eliminate those that may not interest you. This helps us keep expenses low.

Federal law gives you the right to limit some but not all sharing of your personal information. You may not limit sharing of information of your transactions and experiences with TIAA Companies, but you may limit sharing of information about your creditworthiness.

Unless you tell us otherwise and opt out, (i) the TIAA Company(ies) with which you have a business relationship may share information about your creditworthiness with other TIAA Companies or (ii) other TIAA Companies may use your personal information for marketing purposes.

If you are a Vermont resident, state law gives you an additional right: we will not share information about your creditworthiness with other TIAA Companies except with your consent.

If you opt out, the TIAA Company(ies) with which you have a business relationship will still notify you of their new products or services. Please note that we cannot withdraw any previous disclosures made with your authorization.

To opt out of either information sharing or marketing, or both, please call the National Contact Center weekdays, 8 a.m. to 10 p.m. (ET) at 800-842-2252. You may receive more than one privacy notice from the TIAA Companies depending on the products you own.

If you own a life insurance contract, brokerage account, or a TIAA-CREF Funds account with a co-owner, you and the co-owner may:

- Opt out separately, or
- Either of you may opt out for both of you

If you opt out separately, we will limit disclosure of information only for the owner who has opted out. If you indicate that you are opting out for the co-owner as well, we will limit disclosure for both of you.

Your opt-out becomes effective as soon as practicable. It remains in effect until you revoke it in writing.

### Changes in our privacy notice

TIAA periodically reviews its privacy notice and reserves the right to amend it. If amended, TIAA will continue its commitment to maintaining the security and privacy of your personal information. We will notify you of material changes prior to when they take effect through a banner notice in our website, TIAA.org.

# How to change or correct your personal information

To change or correct information such as your name, address, retirement start date, telephone number, email address, or other personal information, please log on to your TIAA account page at TIAA.org and submit your changes. If you want to change your address on fewer than all contracts, you will need to select "click here" located under the email section of the page.

You may also change your personal information by calling our National Contact Center at **800-842-2252** weekdays, 8 a.m. to 10 p.m. (ET). Note that certain changes cannot be processed over the phone. You may send letters to:

TIAA, P.O. Box 1259, Charlotte, NC 28201

For Nevada residents, state law requires that we provide you notice that you have the option to be placed on our Internal Do Not Call list. If you would rather not receive marketing calls from us, please call us at the telephone number provided above.

#### **Former customers**

If your customer relationship with TIAA ends, we will not destroy your personal information unless required or permitted by law. We will continue to treat your personal information in accordance with this privacy notice and applicable laws.

## Our digital tracking practices

TIAA uses digital tracking technology including, but not limited to, pixels, beacons, and cookies to collect from your computer or other connected device information about you, your internet and website activity, and your preferences. We utilize such information for the following purposes:

- To make our website usable by enabling basic functions, like page loading, account sign-in, and filling out forms;
- To monitor website traffic and activity;
- To maintain security, enable fraud detection, and provide trouble-shooting and support;
- To facilitate an action initiated by you, such as setting or detecting your privacy settings;
- To establish and maintain a logged-in connection while you are in the secure section(s) of our website. For example, when you visit your account, perform transactions, update contact information or perform other activity a "cookie" allows you to navigate from page to page in a secure fashion without having to repeatedly log in;
- To enable us to personalize your web experience by remembering your online preferences including, but not limited to, your preferred language, web layout, or location settings;

- To detect your browser and device capabilities for displaying website content;
- To understand how you interact with our marketing content and use our website, including in some instances identifying the marketing channel through which you have accessed our site; and
- To track your visit across our websites and to serve you targeted advertising and content we think will interest you while you are on our site or visiting non-TIAA sites ("interest-based advertising").

Personal information collected by our use of digital tracking technology is information that, on its own, might not identify you; however, when such information is combined with other information about you, it may be possible to identify you or your household. In the context of digital tracking technology, such information may include:

- Your identifiers, including your cookie identifier, Internet Protocol address, hashed email address, device identifier, mobile ad identifier, and similar online and unique personal identifiers;
- Your geolocation data; and
- Your internet or other electronic network activity information, such as the time you spent on the website, your navigation throughout the site, and other information regarding your interaction with an internet website, application, or advertisement).

Digital tracking technology may be deployed by us or our service providers, on our behalf, for analytics, marketing, and interest-based advertising services. We may and our service providers may also rely on other third parties to deliver to you our interest-based advertising on websites or platforms that you may visit while online. TIAA and its service providers do not share your personal information with these third parties to enable interest-based advertising.

### How to manage your digital tracking preferences

By visiting our digital preference management center [link], you have the ability to review a current list of digital tracking technology that we allow on our sites and manage your digital tracking preferences, including opting out of interest-based advertising. Please note that your opt-out preferences will be stored in cookies

and that if you clear your cookie cache or access our site from another device, we will not have the ability to identify you for the purpose of applying your opt-out choices, and you will need to opt out again.

Our website detects the Global Privacy Control signal from a number of common browsers, and we will automatically opt you out of interest-based advertising if we detect that you have enabled this signal. To learn more about the Global Privacy Control, please visit globalprivacycontrol.org.

### Browsing to other sites:

When you use a link to go from **TIAA.org** to another web site, the **TIAA.org** privacy notice is no longer in effect. Your browsing and interaction on any other web site is subject to the rules and policies of that site. We encourage you to read the rules and policies of the sites you visit to further understand their procedures for collecting, using, and disclosing personal information.

### The TIAA Companies

As described in this notice, "TIAA", the "TIAA Companies" or "we" are financial companies using the TIAA and/or Nuveen brands that share a common corporate identity. TIAA Companies include but are not limited to the following:

- Teachers Insurance and Annuity Association of America and TIAA-CREF Life Insurance Company (TIAA Life) are insurance companies. They provide products such as life insurance and annuities.
- College Retirement Equities Fund (CREF) is an investment company that is the companion organization to TIAA.
  CREF provides retirement annuities.
- TIAA-CREF Funds is an investment company.
- TIAA-CREF Life Funds is an investment company.
- Teachers Advisors, LLC, is an investment advisor. It provides services for our mutual funds and personal annuities.
- TIAA-CREF Investment Management, LLC, is the investment advisor to CREF.
- TIAA-CREF Individual & Institutional Services, LLC, is the principal underwriter for CREF and the TIAA Real Estate Account and is authorized by agreement to sell and service TIAA-CREF Funds, TIAA-CREF Life Funds, and interests in tuition savings products. It also provides brokerage accounts through TIAA-CREF Brokerage Services.
- TIAA Trust, N.A. is a federally chartered, trust-only national bank. It provides investment management, fiduciary and custody services for individuals and institutions.



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