

Ethics Helpline Privacy Notice

Your privacy is important to us. This Ethics Helpline Privacy Notice applies to visitors, users, and others (e.g., employees, job applicants, customers, etc.) who use the Ethics Helpline. The information in this Privacy Notice is provided by Prudential Financial, Inc., its subsidiaries, and affiliates. The Prudential entities providing this Privacy Notice are referred to herein as “we” or “us” and include Prudential Financial, Inc. and subsidiaries and affiliates that use the names Prudential, Pruco, PRIAC and PGIM. This Privacy Notice explains how we collect, use, and disclose personal information relating to the Ethics Helpline and does not apply to other services, relationships or activities that have their own privacy notices or statements. California Residents should also consult our [California Resident Privacy Statement](#).

HOW WE COLLECT INFORMATION

Information You Provide

Prudential may collect the following information through the Ethics Helpline: your name, title and contact details; the name and other data about individuals named in your report; a description of the conduct at issue in your report, including the date, location, and other pertinent information; any questions you may have; and any other information you provide.

Information From Other Sources

Prudential may also collect information from others, including from colleagues, Human Resources, the Ethics team, third parties, etc. during any subsequent review or investigation.

SENSITIVE INFORMATION

Unless required for you to communicate your concern, we ask that you not send us, and you not disclose, any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through these services, or otherwise to us.

USE OF PERSONAL INFORMATION

We collect and process personal information about you for the following reasons:

- Because you voluntarily provided this information;
- Because this information is necessary to review, investigate and resolve your report;
- Because this information is of particular importance to us, and we have a specific legitimate interest under law to process it;
- To comply with a legal obligation; or
- Where necessary to protect the vital interests of any person.

Where the processing concerns information you voluntarily provided to us, or the processing is based on your consent, you may withdraw your consent at any time as permitted by applicable law.

DISCLOSURE OF PERSONAL INFORMATION

Your submission will be shared with the appropriate Prudential organization or affiliate for the purposes described in this Privacy Notice. Sharing your personal information may include transferring personal information to other countries (including countries other than where you are based that have a different data protection regime than is found in the country where you are based). A list of the affiliate companies that may jointly process your personal information is available in our securities disclosures, including 10-K available [here](#), and/or upon request (please refer to the 'Contact Us' section at the end of this Notice).

Prudential has contracted with NAVEX to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Ethics Helpline and related services.

Additional Information on Cross-Border Transfers

Personal information may be stored and processed in any country where Prudential has facilities or in which we engage service providers, and by using this service, you understand that your information may be transferred to countries outside of your country of residence, including to the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access this personal information.

Additional Information for the EEA

Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your personal information.

OTHER USES AND DISCLOSURES OF PERSONAL INFORMATION

Subject to its needs to investigate and take action as a result of ethics complaints received, Prudential will, to the extent it is practical, maintain confidentiality of the concerns raised and personal information received.

We also use and disclose personal information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so, including:

- To comply with applicable laws and regulations – this can include laws outside your country of residence;
- To cooperate with public and government authorities – this can include authorities outside your country of residence;
- To cooperate with law enforcement;
- To assist our affiliates and others, as appropriate, to resolve ethics complaints;
- To enforce our terms and conditions and to protect our rights, privacy, safety, or property, and/or that of our affiliates, employees, customers, you and others; and
- To complete a sale or business transaction. We may have a legitimate interest to disclose or transfer personal information to a third party in the event of any reorganization, merger, sale,

joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

RETENTION PERIOD

We retain personal information for as long as needed or permitted considering the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you (for example, when the investigation has been closed, and no further action is needed);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of certain transactions for a certain period before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

SECURITY

We seek to use reasonable organizational, technical, and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the “Contact Us” section below.

ACCESS, CORRECT OR DELETE YOUR PERSONAL INFORMATION

If you would like to request to access, correct, update, suppress, restrict, or delete personal information, object to the processing of personal information, or if you would like to request to receive a copy of your personal information for purposes of transmitting it to another company (in each case, to the extent these rights are provided to you by applicable law), you may contact us by sending an e-mail to the Ethics Office (ethics@prudential.com). We will respond to your request consistent with applicable law. In your request, please describe your relationship to Prudential (ex: former customer, current customer, employee, vendor), and please make clear what personal information you would like to have changed, and if you would like to have the personal information suppressed from our databases. For your protection, we may only implement requests with respect to the personal information associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will work to comply with your request in accordance with applicable data protection regulations. Please note that we may need to retain certain information for recordkeeping purposes, to meet legal obligations, and/or to complete any transactions that you began prior to requesting a change or deletion.

USE OF SERVICES BY MINORS

The Helpline is not directed to individuals under the age of eighteen (18), and we do not knowingly collect or post personal information from individuals under the age of eighteen (18).

EFFECTIVE DATE

This Privacy Notice is effective as of the “LAST UPDATED” date above. We reserve the right to change this notice. If we change it, we will post the current privacy notice on this page. Any changes to this notice will be effective as of the day they are posted. Use of the Ethics Helpline following these changes signifies acceptance of the revised Privacy Notice.

CONTACT US

If you have any questions about this Privacy Notice, please contact us at ethics@prudential.com or write to us at the following address: 751 Broad Street Newark, NJ 07102 Mail Stop: NJ-01-04-45. We will respond to your request in accordance with applicable law.

ADDITIONAL CONTACT INFORMATION REGARDING THE UK AND EEA

- The contact information for our data protection officer (DPO) in Germany is as follows: Jochen Geck VIVACIS Consulting GmbH Horexstraße 1 | ALTER GÜTERBAHNHOF D - 61352 Bad Homburg Telephone: +49 160 938 492 30 Email: jochen.geck@vivacis.de
- You may lodge a complaint with an EU/EEA or the UK data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities in the EU/EEA is available at [HTTP://EC.EUROPA.EU/NEWSROOM/ARTICLE29/ITEMDETAIL.CFM?ITEM_ID=612080](http://ec.europa.eu/newsroom/article29/itemdetail.cfm?item_id=612080) and information regarding lodging a complaint with the UK ICO can be found here: <https://ico.org.uk/make-a-complaint/>

ADDITIONAL CONTACT INFORMATION REGARDING SINGAPORE

- The contact information for our data protection officer (DPO) in Singapore is as follows: Cai Kuangyi, Director, Operational Risk Management 88 Market Street #43-06 CapitaSpring, Singapore 048948 Telephone: Main Office: +65 6735 2833 Direct Line: +65 6739 7234 Email: colin.cai@pgim.com
- For lodging complaints to the regulatory body, PDPC, members of public will use the following website: <https://www.pdpc.gov.sg/complaints-and-reviews>