

## Privacy Policy

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Thrivent values your business and promises to safeguard the information we collect about you. The information we gather is shared only with outside organizations that perform services for us or on our behalf or as permitted or required by law. Please review this Policy to help you better understand our views and practices regarding the collection, protection, sharing and use of your information.

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### Scope

This Privacy Policy is being provided by Thrivent and select affiliates, referred to in this Policy as “Thrivent.”

This Policy applies to individuals who provide information to Thrivent or about whom Thrivent collects information. If you are a prospective, existing or past Thrivent customer and have been provided a copy of our Privacy Notice at any time, any personal information collected as part of that customer relationship will be used in accordance with our [Privacy Notice](#).

This Policy does not address personal information collected for workforce-related inquiries or transactions. For additional details about the use of personal information for workforce matters, please refer to the [Workforce Privacy Policy](#).

### Information we collect, use and share

We collect two basic types of information:

- Personal information – information that can be used to identify you as an individual.
- Anonymous information – information collected about your behaviors that doesn't identify you.

By expanding on each of the categories below, you can gain insight into the types of information we collect, collection sources, the business purpose for collection, and where the information is shared.

### Identifiers

#### Description of information collected

This includes real name, postal address, IP address, email address, phone number or other similar identifiers.

### Source of information

Most identifiers are collected directly from you, depending on the information you choose to provide. Your IP address is collected from your device as you use the Internet.

#### Purpose of collection

Identifiers are collected so we can perform services for you, such as fulfilling an order, honoring your request for contact, or registering you for an event.

If you register for access to Thrivent.com, we will ask you to provide, among other things, your Thrivent Member ID and date of birth to verify your identity. After initial registration, you will be asked to create, and thereafter use, a designated user ID and password for logging in to your secure online account. In addition, as part of our enhanced online log in process, we require you to provide your email address or phone number so you are able to receive, and then provide to us, a verification code. An email address may also be used to retrieve a forgotten password. All information provided after log in, such as transaction requests, will be collected and retained to meet regulatory and business purposes.

Online identifiers, such as IP addresses, are collected so Thrivent can gain insights to improve our business as well as learn about opportunities to market other products and services that may be of interest to you. This information may also be collected for information security purposes.

#### Sharing of information

This information may be shared with service providers who perform services on behalf of Thrivent, including marketing. It may also be shared with government agencies and regulators to demonstrate Thrivent's compliance with various laws and regulations.

IP addresses may be collected and used by certain third parties who, through the use of cookies, perform behavioral tracking and advertising across multiple webpages.

This information may also be shared within Thrivent's family of companies.

### Protected classifications

#### Description of information collected

This includes data elements that provide insights into any one of many classes that are afforded special protections under the law. Thrivent may collect age, gender, religious or other classification data that you choose to provide.

#### Source of information

This information is only collected from you directly, based upon your decision to engage with certain Thrivent initiatives.

#### Purpose of collection

This information is only collected so we can perform services for you. For example, we may request age and gender to process your request for a product quote.

If you choose to participate in our research efforts, you may be asked to provide age and gender so we may group research participants into appropriate categories.

#### Sharing of information

This information may be shared with service providers who perform services on behalf of Thrivent. It may also be shared with government agencies and regulators to demonstrate Thrivent's compliance with various laws and regulations.

This information may also be shared within Thrivent's family of companies.

## Internet or electronic network activity

### Description of information collected

This includes items such as browsing history, search history and information regarding your interaction with a website, email, application or advertisement.

This information is collected via cookies and Web beacons, which, generally, are used together for aggregate/anonymous behavioral tracking. However, after you log in to Thrivent.com or take some other action that personally identifies you online, this otherwise aggregate information may then be associated to you personally. In addition, if you open any emails from Thrivent, your behaviors (emails opened, links clicked, reading time, etc.) are associated back to your unique email address.

### Source of information

This information is obtained from your device as you interact with Thrivent online.

### Purpose of collection

In general, this information is collected for internal research – to measure consumer interaction with Thrivent online. However, once associated to you personally, this information may be used for targeted marketing or to create a consumer profile, discussed in more detail below.

### Sharing of information

This information may be shared with service providers who perform services on behalf of Thrivent, including marketing. In addition, other third parties who are not service providers may collect this information with your consent to perform targeted marketing. It may also be shared with government agencies and regulators to demonstrate Thrivent's compliance with various laws and regulations.

This information may also be shared within Thrivent's family of companies.

## Geolocation

### Description of information collected

Geolocation data can reflect where you are located. Thrivent may collect an IP address, which is registered to a geographic location. This is not linked directly to your residential address, but to a general access location.

### Source of information

This information is obtained from your device as you interact with Thrivent online.

## Purpose of collection

Thrivent uses this geographic location information for security purposes to ensure only IP addresses located in an authorized geographical location can access Thrivent's website.

### Sharing of Information

This information may be shared with service providers who perform services on behalf of Thrivent, including marketing. It may also be shared with government agencies and regulators to demonstrate Thrivent's compliance with various laws and regulations.

This information may also be shared within Thrivent's family of companies.

## Sensory

### Description of information collected

In general, this would include audio, electronic, visual, thermal or olfactory information. Thrivent will only collect your voice as part of a call recording if you contact one of our call centers, or your likeness, in the form of photos or videos, if you choose to participate in one or more contests or campaigns that solicit that information.

### Source of information

This information is only collected from you directly, based upon your decision to engage with certain Thrivent initiatives.

### Purpose of collection

Call recordings are captured for quality assurance and training purposes to ensure your request is handled appropriately. Photos and videos are collected as a requirement to participate in select campaigns or contests. We will use that submission only for the purposes outlined in the respective contest's or campaign's rules/terms and conditions.

### Sharing of information

This information may be shared with service providers who perform services on behalf of Thrivent. It may also be shared with government agencies and regulators to demonstrate Thrivent's compliance with various laws and regulations.

This information may also be shared within Thrivent's family of companies.

## Other personal information

### Description of information collected

This category covers personal information not included in other categories. For example, Thrivent may collect high-level

financial indicators as part of a research initiative or through an online or budgeting quoting tool.

### Source of information

This information is only collected from you directly, based upon your decision to engage with certain Thrivent initiatives.

### Purpose of collection

This information allows us to group participants into appropriate categories, for research or other analysis purposes. In other situations, this information is necessary for you to effectively engage with our tools and services.

### Sharing of information

This information may be shared with service providers who perform services on behalf of Thrivent. It may also be shared with government agencies and regulators to demonstrate Thrivent's compliance with various laws and regulations.

This information may also be shared within Thrivent's family of companies.

## Consumer profile

### Description of information collected

We may collect any or all the information in the above-referenced categories to create a consumer profile for you. This may include your preferences, trends or behaviors that we can determine from your interaction with Thrivent and your online activity.

### Source of information

This profile is likely a combination of information collected from you directly and the information that is obtained from your device as you interact with Thrivent online.

### Purpose of collection

We collect this information so we can provide you with products and services we believe would be of interest to you. Also, when your consumer profile information is combined with others like you, we can understand similar behaviors and trends, which helps propel our business strategy to assist you in the future.

### Sharing of information

This information may be shared with service providers who perform services on behalf of Thrivent, including marketing. It may also be shared with government agencies and regulators to demonstrate Thrivent's compliance with various laws and regulations.

This information may also be shared within Thrivent's family of companies.

## Anonymous

### Description of information collected

When you visit our website, we collect data about your activities that does not personally or directly identify you. We may use a variety of technologies that automatically or passively collect aggregate information about how our websites are accessed and used (“Usage Information”). Usage Information may include browser type, device type, operating system, application version, the page served, the time, the preceding page views, and your use of features or applications on the website.

Similar Usage Information is collected when you use a Web or mobile browser to click on a Thrivent advertisement provided by a third-party search engine. If you choose to contact Thrivent on your mobile phone in this manner, we will also collect aggregate call data, such as duration; however, we will not collect your phone number.

### Source of information

This information is obtained from your device as you interact with Thrivent online.

### Purpose of collection

Thrivent uses this Usage Information to help ensure a safer online environment for all site visitors, for general aggregate site visitor analysis and statistical research, to increase visitor satisfaction in their online experience with Thrivent, and to aid in problem resolution if you experience technical difficulties while using our website.

### Sharing of information

Thrivent may share this information with third-party vendors and hosting partners, known as service providers, to provide hardware, software, networking, storage, support or related technology required to run our websites. In addition, we use service providers to act as a data processor of any collected data. The service providers will aggregate anonymous collected data to improve the usability of the website. The service providers will also store any collected data for later retrieval by Thrivent and its agents to review aggregate analytics.

This information may also be shared within Thrivent’s family of companies.

## How you can update your personal information

If you are a registered user of Thrivent.com, you can update some of your personal information, including your email address and phone number, through your online personal profile. To update your profile:

- Log in to a secure area (such as My Thrivent), and click “Update Personal Information” to go to the “Manage My Profile” section on Thrivent.com.
- Click on the “Communication Choices” tab and select the information you’d like to update.
- Click “Save” to submit your changes. The information will be updated.

For all other requests to update personal information, you can contact our call center at 800-847-4836. We are available to answer calls between 7 a.m. and 6 p.m. Central time, Monday through Friday.

## How to opt out of data sharing and email marketing

To opt out of data sharing and email marketing, write to us at:

**Thrivent**  
**4321 N. Ballard Rd**  
**Appleton, WI 54919-0001**

Or call us toll-free at 800-847-4836. Service representatives are available to answer calls between 7 a.m. and 6 p.m. Central time, Monday through Friday.

If you are a registered user, you can also update your preferences online. To change your data sharing and email marketing preferences via Thrivent.com:

- Log in to a secure area (such as My Thrivent), and click “Update Personal Information” to go to the “Manage My Profile” section on Thrivent.com.
- Click “Communication Choices.”
- On the “Communication Choices” tab, find the preference you are looking for.
- Select your new option.
- Click “Submit” to save your changes. Your new preference is now stored.

If you have an email address on file, you will receive a confirmation email acknowledging that changes were made online.

### Opt-out options

If you wish to opt out of data sharing or marketing, you may select one or more of the following:

- **Tell us not to share data about you within our family of companies.** However, we may still share transactional and experiential data, including the existence of your products, services or benefits, as well as data about you as needed by our fraternal operations.
- **Direct us not to share data about you with our partners and other third parties.** This includes other financial

institutions with which we have joint marketing agreements as well as nonprofit Christian organizations. For known residents of California, Minnesota, North Dakota, New Mexico and Vermont: We do not share data about you with nonprofit Christian organizations unless you specifically provide us consent to do so.

- **Ask us to remove your name from some or all of our internal marketing lists.** You should know that our regular service mailings may still contain marketing materials. If you have opted in to receive electronic service notifications or confirmations, you will continue to receive such emails.

For email marketing that you already receive, please choose “unsubscribe” within the email itself to opt out of future email marketing. If you wish to no longer receive text messages, please visit [this website](#) to identify opt-out options available for the type of text messages you are receiving.

## Our policy for children

Your children’s safety is important to us. We have developed our privacy guidelines in compliance with the requirements outlined by the Federal Trade Commission (FTC) Children’s Online Privacy Protection Act (COPPA). See the FTC site for additional information on COPPA. Per a ruling effective June 10, 2010, no registrations are allowed to be accepted if the birth date indicates the individual is under the age of 16. Additionally, no information should be submitted to or posted on our site by children under 16 years of age without the consent of their parents or guardians.

## Information for California residents

The following sections apply to California residents who are considered consumers under the California Consumer Privacy Act. These sections do not apply to California residents who are Thrivent customers, where the information collected, used and shared is addressed by the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act. If you are a Thrivent customer, please refer to our **Customer Privacy Notice** for a description of your rights.

**Sale of personal information.** Thrivent does not sell the personal information of any California consumers.

**Disclosure of personal information.** All categories of personal information may be disclosed for a business purpose. Generally, this involves sharing under the following circumstances: auditing,

compliance with a regulatory inquiry, detecting and preventing security incidents, technical functionality improvements, and third-party service providers who perform services on Thrivent's behalf, such as processing payments, verifying customer information, and marketing and analytical services.

**Minors under 16.** We do not knowingly sell the personal information of minors under the age of 16 years of age without affirmative authorization.

**Rights granted.** Residents of California also have the following rights available, regarding personal information collected from you or collected about you from other sources. You, or your designated authorized agent, may elect to:

- Request that we provide you with specific pieces of personal information we have collected about you.
- Request that we disclose to you the categories of information we collected about you, whom we collected that information from, how we used it, and whom we have sold it to or shared it with.
- Request the deletion of personal information we collected from you, which we will comply with unless it is necessary for us to retain the information, in accordance with exceptions provided by law.

To make any of the above requests, please click [here](#) or call us at 800-847-4836 extension 6282359.

**Antidiscrimination.** Rest assured that we will not discriminate against you if you choose to exercise any rights prescribed to you by law.

**Authorized agents.** While an authorized agent may act on behalf of a California consumer, we may request written permission from the consumer before honoring any requests made by an authorized agent. Any identity verification, noted below, will need to be completed by the consumer directly.

**Verification.** If there is a need to verify your identity prior to releasing information in accordance with your request, we will contact you at the phone number you provided in your request submission. At that time, we will conduct additional knowledge-based authentication to ensure only people who have a legal right to obtain information can do so.

## Do you reside in the European Union?

If you reside, permanently or temporarily, in the European Union, we may provide

you with additional options concerning your information.

### Changes to your personal information.

We rely upon you to update and correct your personal information. If you identify an error in your information you can make a request that we modify it by contacting us using the information in the Questions or Comments section below.

**Access to your personal information.** If required by law, we will grant reasonable access to personal information that we hold about you. All requests must be directed to the address included in the Questions or Comments section below.

**Revocation of consent or restricting processing.** If you revoke your consent for the processing of personal information or wish to restrict the ways in which we can use your information, then we may no longer be able to provide you certain services. In some cases, we may limit or deny your request to revoke consent or restrict use if the law permits or requires us to do so or if our processing is not based on your consent. If you would like to revoke your consent or restrict our use of information, such a request must be directed to the address included in the Questions or Comments section below.

**Deletion of your information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required by one of Thrivent's industry regulators. If required by law and permitted by our regulators, we will grant a request that we delete your personal information. All such requests must be directed to the address included in the Questions or Comments section below.

**Collection of cookie data.** Certain portions of the below Online Technology section do not apply when you access Thrivent.com and Myservice.Thrivent.com from the EU. We will not use cookie technology to collect data about your activities on our websites for advertising purposes. Cookies may be collected to improve the quality of business services and to enhance security when logging into our websites.

## Online technology

### Our use of cookies

Cookies are a technology storage mechanism. Specific pieces of information, some of which may be personal, such as IP address, are contained within a cookie. Most often though, the cookie will contain anonymous unique identifiers given to your Web browser by a Web server. The browser stores the cookie on your device. The cookie and any information contained

within it is sent back, via a Web beacon, to the server each time your browser requests that site.

Thrivent's websites use cookie technology. The information within the cookie might be about you, your preferences or your device, but mostly, cookies are used to make the site work as you would expect it.

We generally employ four types of cookies.

- **Necessary:** These cookies are necessary for the website to function and cannot be switched off in our systems. They do not store any personally identifiable information.
- **Performance:** These cookies allow us to count visits and traffic to our sites so we can improve the site's performance. All information contained in these cookies is aggregate and anonymous and it is recommended that they not be turned off.
- **Functional:** These cookies allow our website to provide you customized services or personalization and increase the quality of your online experience. These cookies may be set by us or a third party on our behalf.
- **Targeting:** Third parties may use cookies on our behalf to recognize your device and display Thrivent advertisements on other sites. In this case, the third party is acting as a service provider to Thrivent, so we can market more effectively. Where the information would be shared and the third party is not a service provider, your consent is required before allowing these cookies to be active.

For security reasons, cookies are not used for automatic access to secure areas on Thrivent's websites. You need to type your user ID and password every time you log in to a secure access area. As part of login processes on Thrivent.com, your device may be remembered. In these cases, a cookie will be placed on your computer.

Keep in mind that cookies:

- Cannot be used to reveal your email address obtained from your hard drive or learn confidential or personal information about you that you have not already explicitly revealed.
- Cannot read data off your hard drive or read cookie files created by other sites.
- Are not executable programs and cannot damage your computer or files on your device.

### How to set or delete your computer's cookies

You can set your computer's browser to opt out of receiving and storing cookies.

However, doing so may limit your access to certain sections of our site. You also can delete cookies stored on your computer's browser. Clearing your browser's cookies is the only way to change the Thrivent cookie settings you may have previously elected or opted out of.

If you have previously selected to have Thrivent.com remember your device, deleting cookies will disable this feature. The process to set or delete cookies differs by browser. See your browser's Help feature or contact the manufacturer for instructions on how to set or delete your browser's cookie options.

### **Do we use Web beacons?**

Web beacons (also known as Web bugs, pixels and page tags) are the mechanism with which cookies and their data are transferred across the Internet. In other words, Web beacons and cookies work in conjunction with each other to monitor the behavior of site visitors. Thrivent uses Web beacons on its websites and in email communications for statistical purposes and marketing conversion tracking.

The only way to decline the use of Web beacons as part of email delivery is to opt out of receiving emails from Thrivent entirely.

### **How do we respond to 'Do Not Track' signals?**

Thrivent does not respond to "Do Not Track" signals. On Thrivent.com, notification is provided concerning cookies and tracking of information. Where information may be shared with a third party that is not a service provider, consent is required prior to sharing of such information.

### **How we secure the information we collect**

Thrivent has security standards to protect your data by putting in place physical, technical and administrative safeguards. The technology we use to protect your data is reviewed and improvements are implemented as needed.

Authorized employees and representatives are permitted to access and use data about you for approved business purposes. All employees and representatives must complete required training to ensure they understand and follow established policies and laws when using your data.

Your information may be accessible by third-party vendors for the purpose of enabling them to store such data in connection with the permitted uses of your information under this Privacy Policy. Our third-party website providers have an obligation to maintain the confidentiality of the information, except where disclosure is required by law.

### **Our use of encryption technology**

Several areas on Thrivent's website (e.g., My Thrivent) have been built to handle confidential information. These pages utilize an Internet method known as Secure Socket Layers (SSL). With SSL, pages are sent to you in an encrypted (scrambled) format and any information you submit to Thrivent is also encrypted. Encryption is the transformation of data into a form unreadable by anyone who doesn't have the appropriate decryption key. This method of transferring confidential data is considered the industry standard for the Internet.

For added security, close your browser completely when you finish using Thrivent's websites. While you are on the Internet, your browser is using part of your computer's memory. If your browser is left open, it may be possible for someone using your computer to go back and use this memory to access your information.

By closing your browser, this action will clear this memory. Another action to consider would be to clear your browser's temporary files.

For your security, we highly recommend maintaining an updated browser version that supports SSL. Microsoft Internet Explorer, Microsoft Edge, Google Chrome, Mozilla Firefox and Apple Safari are five browsers that support these encryption techniques. A solid lock graphic will display when the SSL mode is engaged to reflect the connection is encrypted. If you are not sure if your browser is compatible, check with your service provider.

Thrivent has taken steps to make all information you provide to us as secure as possible against unauthorized access and use, alteration and loss. This information is kept in Thrivent's secure database. You should keep in mind, however, that no data transmission over the Internet is 100% secure and any information disclosed online can potentially be intercepted and used by unauthorized parties.

### **What about links to other websites from Thrivent's site?**

The Thrivent website contains links to several other external websites. Although our intent is to provide links to other quality sites, we cannot guarantee the safety and privacy of information you provide to these linked sites. Any data or personal information collected by websites other than Thrivent's is not covered by this privacy policy.

### **Transmission of data to other countries**

Your personal information is processed in the United States, where privacy laws may be less stringent than the laws in your country and where the government, courts or law enforcement may be able to access your information. By submitting your personal information to us, you agree to the transfer, storage and processing of your information in the United States.

### **Questions or comments?**

If you have questions regarding our Privacy Policy, send a message using our online [Contact Us](#) form, or send your written request to:

**Thrivent**  
**4321 N. Ballard Rd**  
**Appleton, WI 54919-0001**

Complaints can also be sent to us at the address above. Some jurisdictions may allow you to register a complaint with a data protection authority.

Also, if you receive email messages from Thrivent about updates to our website and wish to no longer receive these updates, you can unsubscribe from our mailing list following the unsubscribe directions in the email. You also can unsubscribe by updating your preferences online if you are logged in (find the Communication Choices section located within Manage My Profile).

Notice of any material change to our Privacy Policy is given on this website's homepage.

This Privacy Policy became effective Dec. 5, 2014. Updates are current as of May 22, 2020.