

American International Group, Inc.

Global Employee and Non-Employee Worker Personal Information Privacy Notice

1. Introduction

American International Group, Inc. and its affiliated entities (“AIG,” “we,” or “us”) value the trust of our workforce and are committed to handling Personal Information appropriately in accordance with applicable law. This Global Employee and Non-Employee Worker Personal Information Privacy Notice (the “Notice”) applies to employees and other workers that are not employed by AIG but have access to AIG facilities and/or corporate networks and systems (hereinafter, “Employee” and “Non-Employee Worker,” respectively).

The purpose of this Notice is to explain what Personal Information we collect, access, use, store, transfer and disclose (together, “process”), and why, in connection with your employment or engagement by us. As used in this Notice, “Personal Information” refers to information about you and other individuals (for example, your partner or other members of your family), and from which you or they are identifiable.

This Notice may be supplemented by other privacy notices that are specific to certain jurisdictions, uses of your Personal Information, summaries or for other reasons detailed in such supplemental notices.

2. Who Is Responsible For Your Personal Information

Each AIG affiliated entities that processes your Personal Information is responsible for looking after it in accordance with this Notice, our internal standards and procedures, and the requirements of data protection law.

If you are an Employee or Non-Employee Worker, the AIG affiliated entity that employs or engages you will be the main company responsible for your Personal Information. A list of the key AIG affiliated companies that are data controllers is available here www.aig.com/datacontrollers.

If you are a member of an AIG pension plan, the Trustees will be responsible for the Personal Information held and processed by the Trustees in connection with that plan.

3. Personal Information We Process

In the course of your employment or engagement we process Personal Information about you and/or Personal Information of other individuals that you may provide to us. The type and volume of Personal Information will vary depending on your relationship with AIG and the jurisdiction in which you work, but may include the following:

Category of Personal Information	Examples
1. Personal Details	Name, employee or other worker identification number, work and home contact details (email, phone numbers, physical address), language(s) spoken, date and place of birth, national identification number (if permitted by applicable local law), social security number, driver’s licence information, other government issued identification or registration numbers, gender, marital/civil partnership status, domestic partners, dependants, emergency contact information, and

	photographs and videos, and in some instances, personal details of other individuals (such as your family members).
2. Immigration Related Details	Citizenship, passport data, details of residency and work permit.
3. Compensation, Payroll, and Expenses	Base salary, bonus, benefits, information related to insurance policy when provided by AIG, compensation type, changes in compensation, details on stock options, stock grants and other awards, currency, pay frequency, effective date of then-current compensation, salary reviews, banking details, working time records (including vacation and other absence records, leave status, hours worked and department standard hours), pay data, expenses and invoices, card/account number and the card/account use information, and termination date.
4. Position	Description of position(s), job title, corporate status, management category, job code, salary plan, pay grade or level, job function(s) and subfunction(s), company name and code (legal employer entity), branch/unit/department, location, employment status and type (including if you are a Non-Employee Worker), full-time/part-time, terms of employment or engagement, contractual terms, work history, hire/re-hire and termination date(s) and reason, length of service, retirement eligibility, promotions and disciplinary records, date of transfers, and reporting manager(s) information.
5. Talent Management Information	Details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications, language and other relevant skills, certification(s), certification expiration dates), information necessary to complete a background check (including credit check) (as further detailed in Section A (Managing and Administering the Workforce) in the table below under “How and Why We Process Personal Information” and to the extent permitted in your jurisdiction), details on performance management ratings, skills and experience, development programs planned and attended, e-learning programs, performance and development reviews and discussion ratings and comments, including dates for the foregoing, willingness to relocate, feedback expressed about you, and information that you have shared with us to populate employee biographies or to respond to surveys and questionnaires, unless specifically gathered anonymously.
6. Corporate Shareholdings and Positions	Details of any shares of common stock or directorships.
7. Pension Records	Details of your membership of any pension scheme, payments made in connection with the scheme, financial information relating to the scheme and details of beneficiaries of the scheme.

<p>8. Data Related to System, Device, and Application Usage</p>	<p>Information to access company systems or applications such as IT system ID, LAN ID, email account, instant messaging account, mainframe ID, previous employee ID, previous manager employee ID, system passwords, employee status reason, branch state, country code, previous company details, previous branch details, previous department details, audio or video recordings of you, and electronic content produced by you using AIG IT systems.</p>
<p>9. Sensitive Personal Information</p>	<p>We may also collect certain Personal Information that is deemed “sensitive” under local law, such as information about health, medical information, disability status, financial information, religious beliefs, ethnicity, political opinions or trade union membership, sexual life and orientation, biometric information, passwords or information about criminal records or civil litigation history.</p> <p>As with any Personal Information, AIG will only process Sensitive Personal Information where permitted by applicable governing law.</p>

4. Where Your Personal Information Comes From

This Personal Information is obtained from a variety of sources, including:

- your communications with us;
- forms you complete as part of your employment or engagement (including during the recruitment process);
- third parties who undertake background checks on our behalf (both at recruitment stage and, in some instances, on an ongoing basis);
- any websites, intranet sites and online portals made available by us for use on or through computers or mobile devices, which you access and use in the course of your employment or engagement;
- the software applications made available by us for use on or through computers and mobile devices, which you access and use in the course of your employment or engagement, including wearable devices; and
- our social media content, tools, and applications, which you access and use in the course of your employment or engagement.

With the exception of certain information that is necessary to fulfill the employment or engagement contract, required by law or important to the performance of our business, your decision to provide Personal Information to AIG is voluntary. However, if you do not provide certain information, AIG may not be able to accomplish some of the purposes outlined in this Notice.

5. How and Why We Process Personal Information and the Legal Justification for Doing So

We will process your Personal Information for a variety of different purposes during the course of your employment or engagement, and after you have ceased to be employed or engaged by us.

Data protection law seeks to ensure that the way Personal Information is processed is fair and this includes telling you the legal justification we rely on for using your Personal Information. While the law provides several legal

justifications, the table below describes the main legal justifications that apply to our purposes for using Personal Information.

We are required to obtain Personal Information from you to comply with applicable legal requirements, and certain Personal Information is needed to enable us to fulfil the terms of our contract with you (or someone else), or in preparation of entering into a contract with you (or someone else), or for pursuing a right and/or legitimate interest of ours or of third parties. Where necessary we will inform you of this at the time that we are obtaining the Personal Information from you. In these circumstances, if you do not provide the relevant Personal Information to us, this may impact our ability to perform our obligations to you as your employer or the company that engages you. If you would like further information, see section 12 below (**'How You Can Contact Us'**).

Where we rely on our (or a third party's) legitimate business interests to justify the purposes for which we process your Personal Information, those legitimate business interests will typically be one or more of the following:

- pursuit of our commercial activities and objectives, or those of a third party;
- compliance with applicable legal and regulatory obligations and any codes of conduct (for example, by carrying out background checks or otherwise preventing, detecting or investigating fraud or money laundering);
- improvement and development of our business operations and service offering, or those of a third party;
- protection of our assets, information, business, shareholders, employees and customers, or those of a third party (for example, ensuring IT network and information security and enforcing claims, including debt collection, health and safety);
- in respect of Pension Scheme Administration (where applicable) our legitimate interest is to ensure the pension plan is operated effectively and appropriately; or
- to keep our IT network/systems secure, prevent/detect crime and ascertain compliance with internal roles for using the system.

We collect, use and disclose Personal Information in connection with matters of important public interest, for instance when complying with our obligations under anti-money laundering and terrorist financing laws and regulations, and other laws and regulations aimed at preventing financial crime. In these cases, the legal justification for our processing of Personal Information is that the processing is necessary for matters of public interest. Additional justifications also apply depending on the circumstances (for example the requirements of governing laws applicable to you or us).

Special Categories of Personal Information

Only as permitted by governing law applicable to your or us these more sensitive special categories of Personal Information include Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning an individual's sex life or sexual orientation.

For processing of more sensitive special categories of Personal Information we will, to the extent permitted by applicable local law, rely on either:

- one or more of the other legal justifications set out in the table above and typically one of the following three additional justifications (however other legal justifications may be available), to the extent permitted by governing law applicable to you or us:
 - the processing is necessary for the carrying out of obligations and exercising our or your specific rights under employment laws;

- the processing is necessary for the establishment, exercise or defense of legal claims, or whenever courts are acting in their judicial capacity (for example, when a court issues a court order requiring the processing of Personal Information); or
 - the processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis or the provision of health or social care or treatment.
- your consent (but only in exceptional circumstances).

Additional legal justifications may also be available in the country in which you are based and we may also rely on these justifications from time to time.

Processing of Personal Information relating to criminal convictions and offences is subject to the requirements of governing law applicable to you or us.

The purposes for which we process Personal Information, along with the type of Personal Information and the legal basis for which we process Personal Information, is set out in the table below. AIG will not process Personal Information for any other purpose incompatible with the purposes described in this Notice, unless it is required or authorized by law, authorized by you, or is in your own vital interest (e.g., in the case of a medical emergency).

Description of Purpose	Examples	Types Of Personal Information	Why We Process Personal Information
A. Managing and Administering the Workforce	Managing work activities and personnel generally, including recruitment, appraisals, performance management, promotions and succession planning, rehiring, administering salary, payment administration and reviews, wages and other awards such as stock options, stock grants and bonuses, healthcare where permitted by applicable governing law, pensions and savings plans, training, leave, managing sickness leave, transfers, secondments, honoring other contractual benefits, providing employment references, loans, performing workforce analysis and planning, performing Employee and Non-Employee worker surveys, performing background checks (including using your Personal Information, where permitted by applicable governing law, to undertake: ID checks, address verification,	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✓ Position ✓ Talent management information ✓ Management records ✓ Pension records ✓ Data related to System, Device and Application Usage 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✓ Needed to perform a contract with you or prepare to enter into a contract with you ✓ Needed to comply with legal requirements ✓ As may be permitted under applicable law, and to the extent an alternative valid

	<p>education and/or professional qualification verification, employment history verification, criminal or conduct checks, credit/bankruptcy/financial integrity checks, adverse media search, directorship search, regulatory checks (e.g. bribery and anti-corruption compliance), sanctions screening against sanction lists to identify criminal or fraudulent activity, terrorist watch-list search) investigating and managing disciplinary matters (including non-compliance with the AIG Code of Conduct (Code) in the case of employees) and fraud, grievances and terminations, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of training requirements and career development activities and skills, administering apprenticeship schemes, creating and maintaining one or more internal Employee and Non-Employee Worker directories, and promoting diversity and preventing discrimination.</p>	<p>✓ Sensitive Personal Information</p>	<p>justification does not apply, with your consent</p>
<p>B. Maintaining Business Continuity</p>	<p>Ensuring business continuity (including contacting you using your personal contact details (e.g. personal email addresses or mobile phone numbers)), facilitating communication with you at an AIG office, when travelling, during working from home absent an emergency, protecting the health and safety of employees and others, safeguarding IT infrastructure, office equipment and other property, and facilitating communication with you and your nominated contacts in an emergency via any means we deem necessary to reduce any</p>	<p>✓ Personal Details ✗ Immigration Related Details ✗ Compensation, payroll and Expenses ✗ Position ✗ Talent management information ✗ Management records ✗ Pension records</p>	<p>✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✓ Needed to comply with</p>

	risk to you or others (for example by contacting you using your personal contact details by calling or sending SMS text messages).	<ul style="list-style-type: none"> ✗ Data related to System, Device and Application Usage ✗ Sensitive Personal Information 	legal requirements
C. Managing and Improving Our Business and Operations	Operating and managing IT and communications systems, managing product and service development, improving products and services, managing and securing company premises and other assets, allocating company assets and human resources, strategic planning, project management, business continuity, compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals and integration with purchasers.	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✓ Position ✓ Talent management information ✗ Management records ✓ Pension records ✓ Data related to System, Device and Application Usage ✗ Sensitive Personal Information 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✗ Needed to comply with legal requirements
D. Complying with Legal, Regulatory Requirements, and Internal Policies and Procedures	Complying with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations, performing background checks (as detailed above in section A (Managing and Administering the Workforce) above), conducting audits, compliance with government inspections and other requests from government or other public authorities, complying with guidance issued by our regulators, and responding	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✓ Position ✗ Talent management information 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you

	to legal process such as subpoenas.	<ul style="list-style-type: none"> ✓ Management records ✓ Pension records ✓ Data related to System, Device and Application Usage ✓ Sensitive Personal Information 	<ul style="list-style-type: none"> ✓ Needed to comply with legal requirements
E. Defending Legal Rights	Pursuing legal rights and remedies, defending litigation, and managing any internal complaints or claims, conducting investigations, and enforcing with internal policies and procedures.	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✓ Position ✓ Talent management information ✓ Management records ✓ Pension records ✓ Data related to System, Device and Application Usage ✓ Sensitive Personal Information 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✓ Needed to comply with legal requirements
F. Monitoring Workers and Systems	Monitoring – which includes the systematic and repetitive surveillance, tracking, analyzing, observing and/or reviewing an individual – designed to ensure compliance with internal policies, laws and for fraud and crime prevention including monitoring of (i) electronic and verbal communications, including telephone, email, instant messaging, and other electronic messages, (ii) use of	<ul style="list-style-type: none"> ✓ Personal Details ✗ Immigration Related Details ✗ Compensation, payroll and Expenses ✓ Position 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a

	<p>and access to information systems and technology made accessible by AIG, including internet usage and activity, IT hardware and software content, and other company resources, and (iii) AIG premises, including via Closed Circuit Television and building access logs.</p> <p>For more information about how and why AIG monitors individuals, please review AIG's Global Monitoring Notice.</p>	<ul style="list-style-type: none"> ✗ Talent management information ✗ Management records ✗ Pension records ✓ Data related to System, Device and Application Usage ✗ Sensitive Personal Information 	<p>contract with you</p> <p>✓ Needed to comply with legal requirements</p>
<p>G. Administering Pension & Retirements (where applicable)</p>	<p>Trustees of the AIG Pension Plan or Trustees of the AIG Retirement Savings Plan (together the Trustees), of which you are a member (if applicable) will process your Personal Information for management and administration of the plans (where applicable), to make decisions about the pension plans (e.g. to process transfer requests or to make decisions about the payment of benefits) and to carry out the duties of the Trustees.</p>	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✗ Position ✗ Talent management information ✗ Management records ✓ Pension records ✗ Data related to System, Device and Application Usage ✗ Sensitive Personal Information 	<p>✓ It is in our legitimate interests or those of a relevant third party</p> <p>✓ Needed to perform a contract with you or prepare to enter into a contract with you</p> <p>✗ Needed to comply with legal requirements</p>

6. Who Personal Information Is Shared With

From time to time, we sometimes need to make Personal Information available to AIG group companies and other unaffiliated parties for the purposes set forth above. We have set out below a list of the categories of parties who we share your Personal Information with.

Type of Party	Examples
Other AIG Group Companies and Departments	<p>Access to Personal Information within AIG is required by policy to be limited to those who have a need to know the information for the purposes described above, and may include your managers and their designees, personnel in HR, IT, Compliance, Legal, Finance and Accounting and Internal Audit.</p> <p>All Employees and Non-Employee Workers within AIG will have access to your name, position and (i) business contact information, such as work telephone number, office postal address and work email address and (ii) personal contact information, such as personal cell phone number, home postal address and home email address to the extent you make such information generally available (e.g. via corporate directory).</p>
Professional Advisors	<p>Accountants, auditors, actuaries and administrators, lawyers, insurers, bankers, administrators or managers of provident fund schemes and other outside professional advisors in all of the countries in which AIG operates or seeks to operate.</p>
Service Providers	<p>Companies that provide products and services to AIG such as payroll, pension scheme and benefits providers; human resources services, background check providers (and those background check providers may in turn share Personal Information with other third parties, such as former employers, education institutions, etc.), performance management, training, expense management, IT systems suppliers and support; fraud prevention and similar agencies; third parties assisting with equity compensation programs, credit card companies, medical or health practitioners, trade bodies and associations, and other service providers.</p>
Our Clients	<p>Companies that we provide or promote products and services to.</p>
Insurance and Insurance Distribution Parties, and Other Business Partners	<p>Other insurers, reinsurers, insurance and reinsurance brokers, other intermediaries and agents, appointed representatives, distributors, affinity marketing partners and financial institutions, securities firms, and other business partners.</p>
Public and Governmental Authorities	<p>Entities that regulate or have jurisdiction over AIG such as regulatory authorities, law enforcement, public bodies, and judicial bodies.</p>
Other Third Parties	<p>In connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of AIG business, assets or stock (including in connection with any bankruptcy or similar</p>

	proceedings), or any other third party to whom you authorize us to share your Personal Information.
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7. Where We Process Your Personal Information

Due to the global nature of our business activities, for the purposes set out above (see section above ‘How and Why We Process Personal Information’) we may transfer Personal Information to parties located in countries other than where you reside and which have a different data protection regime than is found in the country where you are based, including the United States, United Kingdom, India, Malaysia and the Philippines. When making these transfers, we will take steps designed to ensure that your Personal Information is adequately protected and transferred in accordance with the requirements of data protection law, including by putting in place appropriate data transfer mechanisms (such as contractual clauses). For a list of the companies that may jointly process Personal Information see the major operating companies and subsidiaries of registrant listed in our 10-K. For a list of key AIG affiliated companies that are data controllers see www.aig.com/datacontrollers. American International Group, Inc. will remain responsible for Personal Information about you that is transferred and jointly used.

For further information about these transfers please contact us using the details below (see section 12 below ‘**How You Can Contact Us**’).

8. How We Secure Personal Information and Maintain Data Integrity

AIG will take appropriate measures to protect Personal Information that are consistent with applicable privacy and data security laws and regulations. We use appropriate technical, physical, legal, and organizational security measures which comply with data protection laws to keep Personal Information secure.

When AIG engages a third party (including service providers) to collect or otherwise process Personal Information on our behalf, the third party is required by AIG to undergo a review of their security measures and enter an agreement that requires use of appropriate security measures to protect the confidentiality and security of Personal Information.

AIG will take reasonable steps designed to ensure that the Personal Information processed is reliable for its intended use and is accurate and complete for carrying out the purposes described in this Notice.

9. Personal Information You Provide About Other People

If you provide us with Personal Information about another person, we will process that information in accordance with this Notice.

Before providing Personal Information about another person to us, you must (unless we agree otherwise) (a) inform the individual about the content of this Notice and any other applicable AIG privacy notice provided to you; and (b) obtain their permission (where possible) to share their Personal Information with us in accordance with this Notice and other applicable privacy notices.

10. Your Personal Information Rights

The following is a summary of the data protection rights which are available to you in connection with your Personal Information. However, these rights only apply in certain jurisdictions/circumstances and are subject to certain legal exemptions.

If you wish to exercise your rights, please contact us using the details below (see section 12 below ‘**How You Can Contact Us**’).

Right	Description
Right of access to Personal Information	The right to receive a copy of the Personal Information we hold about you and information about how we use it.
Right to rectification of Personal Information	The right to ask us to correct Personal Information we hold about you where it is incorrect or incomplete.
Right to erasure of Personal Information	This right is sometimes referred to as 'the right to be forgotten'. This is the right to request that your Personal Information be deleted or removed from our systems and records. However, this right only applies in certain circumstances.
Right to restrict processing of Personal Information	<p>The right to request that we suspend our use of your Personal Information. This right only applies in certain circumstances.</p> <p>Where we suspend our use of your Personal Information, we will still be permitted to store your Personal Information, but any other use of this information while our use is suspended will require your consent, subject to certain exemptions.</p>
Right to information about the possibility of denying or withdrawing consent and the consequences of such denial or withdrawal	Where we have relied upon your consent to process your Personal Information, you have the right to information if you choose to deny or withdraw your consent.
Right to complain to the relevant data protection authority	If you think that we have processed your Personal Information in a manner that is not in accordance with data protection law, in accordance with applicable law, you may be able to complain to the data protection regulator where either the alleged infringement took place, or where you live or work.
Rights relating to automated decision making and profiling	<p>The right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you.</p> <p>However, this right only applies in certain circumstances.</p>
Right to data portability	This right allows you to obtain your Personal Information in a format which enables you to transfer that Personal Information to another organization, if this is technically feasible. However, this right only applies in certain circumstances.
Right to withdraw consent to processing of Personal Information	Where we have relied upon your consent to process your Personal Information, the right to withdraw that consent.

Right to provide instructions regarding the management of your Personal Information after your death (only where such right applies under applicable law)	The right to inform us of instructions on how we manage the Personal Information we hold about you after your death.
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11. How Long We Keep Your Personal Information

We will keep your Personal Information only for as long as necessary given the reasons we collect and hold it. Please view the HR section of the AIG Records Retention Schedule for your country for information about retention periods applicable to AIG’s HR-related Company Records. AIG’s Global Record Retention Schedules are accessible via the AIG intranet [here](#). Where applicable, the Trustees of the Pension Scheme will hold your Personal Information for the duration of your membership of the pension plan and a period thereafter until all liabilities, including those of your decedents have ceased in the plan subject to any additional requirements that the Pension Regulator may deem necessary. Please note that retention periods may be extended in response to litigation, investigations, or similar proceedings.

12. How You Can Contact Us

If you would like to get in touch with us, please contact either your local HR representative or HR Shared Services at HRSharedServices@aig.com. You may also contact the Data Protection/Privacy/Information Officer (“DPO”) for your country if appointed; contact details are available [here](#). If a DPO is not listed for your country please reach out to Privacy Governance at PrivacyGovernance@aig.com.

13. When this Notice Was Last Updated and How Future Changes Will Be Notified

This Notice last updated on June 25, 2021.

We review this Notice regularly and reserve the right to make changes at any time to take account of changes in our business activities and legal requirements, and the manner in which we process Personal Information. We will place updates on our intranet, inform you of the updates and where appropriate we will give reasonable notice of any changes.