



# Business Continuity Plan Summary Disclosure



Ensuring the continued operation of our business in the event of a significant business disruption or disaster is very important to us as well as to our customers. Accordingly, Transamerica has a Business Continuity Plan in place to address business contingencies and disaster recovery. This statement is a summary of our Business Continuity Plan. It discloses the existence of backup facilities and arrangements, and addresses how we plan to respond to events of varying scope. By providing this statement to our customers, we hope they acquire an understanding of our procedures designed to enable the continuous and reliable delivery of services if an unexpected disruption of our business occurs.

## Key elements of the Business Continuity Plan

The following briefly describes the key elements of the Business Continuity Plan (the "Plan"):

- **Enterprise command structure:** The Plan provides for a Command Center, consisting of our senior management, to track and communicate the status of interrupted business and to manage recovery efforts. The Command Center has a direct link to the Enterprise Command Center, which coordinates Plan efforts at our parent company level.
- **Business continuity planning:** The Plan includes information and recovery strategies for key resources, critical technologies, and third-party vendors.
- **Business impact analysis (BIA):** We regularly conduct a business impact analysis to inventory our business processes. The BIA allows us to prioritize the most critical processes and plan for recovery. There are also procedures for identifying changes in our financial, regulatory, and reputational (exposures). Data backup and recovery: An Information Security Program exists to ensure the secure collection and storage of data (including our books and records) and to control access to such data. Data and other records are replicated and stored offsite. In the event of destruction or corruption of information databases, they can be quickly reconstructed and restored.
- **Mission critical systems:** Mainframe and internet applications are recovered using Open Systems Data Replication Disaster Recovery. Server data, both operating system and application data, is replicated using hardware-based asynchronous replication technology to facilitate minimal data loss. Our most critical systems can be recovered within 12 hours.

- **Alternate communications between the firm and customers, employees, and regulators (including regulatory reporting):** The Plan provides for an assessment of which means of communication are still available during a business disruption or disaster and to arrange for alternate means of communication, if necessary or appropriate. Such alternate means may include telephone, email, our website, fax, U.S. mail, and in person. With respect to communications with employees, an emergency notification system may be employed to reach employees. In addition, digital communication tools and/or a call tree (which is departmentally based and includes all staff home, cellular, and office phone numbers) may be employed. With respect to communications with our regulators, contact information has been filed with various regulators and we may, during a business disruption or disaster, retain legal representatives or other authorized parties to communicate on our behalf and/or file regulatory reports.
- **Alternate location of employees:** In the event of a business interruption or disaster that affects the availability of a primary physical location, the Plan provides for the location of critical staff at an unaffected physical location or an alternative business resumption site.
- **Critical third-party provider:** We have contacted our critical third-party provider (businesses – e.g., our fund custodian and printing and fulfillment vendor with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical business services), and determined the extent to which we can continue our business relationship with them in the event of a business disruption or disaster. The Plan calls for the establishment of alternative arrangements if a critical third-party provider can no longer provide the needed goods or services because of a business disruption or disaster affecting either party.
- **Customers' access to funds and securities:** With respect to variable investment vehicles that we make available to our customers, we generally do not maintain actual custody of customers' funds or securities, which may be maintained at our critical third-party provider (discussed above). In the event we determine that we – or our critical third-party provider who may be maintaining customer funds or securities on our behalf – are unable to continue business operations, information regarding how customers may access their funds and securities will be made available if the customary access means – e.g., mail, telephone, secure website, etc. – are unavailable or otherwise adversely impacted.

## Events of varying scope and the planned response

The following lists the types of events we consider and briefly describes our planned response to each:

- **Critical system or technology disruption:** We have designed our critical information systems to withstand minor disruptions, such as equipment failure, through the use of redundant equipment, telecommunications facilities, and backup electrical power. We store copies of critical records at an offsite location where they can be retrieved in the event information is lost or destroyed. If a significant event, such as a fire or tornado, damaged our technology facilities and rendered them inoperable, we have agreements in place which provide alternate computing facilities and equipment where we can resume our critical operations. Our most critical systems can be recovered within 12 hours.

- **Single facility disruption:** In the event our offices become unusable, we have implemented a hybrid working environment for our employees to work from home via secure network connection to support our critical business processes. Telephone service has redundancies in place and would remain available to our customers.
- **Business district/metropolitan/regional district disruption:** If a natural disaster or other widespread business disruption occurs, it may not be possible to resume operations using local facilities. In such a significant event, we plan to provide only our most critical services, such as ensuring you have access to your account, by establishing emergency operations at an alternative location. Our goal is to have critical services available within 48 hours.

## Updates and periodic review of the Plan

The Plan will be updated whenever there is a material change to our operations, structure, business, or location. We review the Plan annually to modify it for any changes to our operations, structure, business, or location. We also periodically test the Plan for effectiveness.

## Companies to which the Plan applies

The Plan applies to Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company, Transamerica Casualty Insurance Company, Transamerica Capital, Inc., Transamerica Asset Management, Inc., Transamerica Financial Services, Transamerica Financial Advisors, Inc. (TFA), Transamerica Retirement Solutions, LLC, Transamerica Retirement Advisors, LLC, Transamerica Investors Securities, LLC, Massachusetts Fidelity Trust Company (MFTC), and Transamerica Retirement Insurance Agency, Inc. (TRIA).

## Cautionary language regarding the Plan

We are confident we have addressed the major threats to our business and can continue operating with minimum impact to our customers and business partners. The Plan is designed to respond to disruptions and threats to our business regardless of the disruptive event. It is possible, however, that in spite of our efforts, our ability to function after a catastrophic event may be adversely impacted by the actions (or failure to act) of third parties beyond our knowledge and control.

The information is provided solely to our customers and no further distribution or disclosure is permitted without our prior written consent. No person other than our customers may rely on any statement herein. Our Plan is reviewed and updated regularly and is subject to change. Please visit [transamerica.com](https://transamerica.com) for the most current copy of this disclosure, or you may request an updated copy by submitting a written request to the attention of Transamerica<sup>1</sup> at 6400 C Street SW, Cedar Rapids, IA 52499. You may also call the phone number that appears on your statement.

Para recibir estas notificaciones y su estado de cuenta en español, por favor comuníquese con su Transamerica Service Center. El número gratuito se encuentra en su estado de cuenta.

<sup>1</sup> References to Transamerica apply to an individual company or collectively to these and other Transamerica companies.