

# Park Avenue Investment Advisory Customer Privacy Notice



## Facts

### What does Park Avenue Investment Advisory do with your personal information?

<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	<p>The types of personal information we collect, and share depend on the product or service you have with us.</p> <p><b>This information can include:</b></p> <ul style="list-style-type: none"><li>• Social Security number and income</li><li>• Assets and investment experience</li><li>• Risk tolerance and transaction history</li></ul>
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Park Avenue Investment Advisory chooses to share, and whether you can limit this sharing.

## Reasons we can share your personal information

	Does Park Avenue Investment Advisory share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> — to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes</b> — information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> — information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	No	We don't share

## Who we are

<b>Who is providing this notice?</b>	Park Avenue Investment Advisory Park Avenue Investment Advisory
--------------------------------------	---

Park Avenue Investment Advisory Privacy Policy

Park Avenue Investment Advisory, LLC, is a SEC registered investment adviser. Park Avenue Investment Advisory, LLC is an indirect, wholly owned subsidiary of The Guardian Life Insurance Company of America and is located at 10 Hudson Yards, New York, NY 10001.

## What we do

### Information sharing information

#### How does Park Avenue Investment Advisory protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

#### Why can't I limit all sharing?

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes—information about your credit worthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you
- State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

#### What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account – unless you tell us otherwise.

## Definitions

#### Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include financial companies such as The Guardian Life Insurance Company of America.

#### Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies. Park Avenue Investment Advisory does not share with non-affiliates so they can market to you.

#### Joint marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

Our joint marketing partners include insurance companies and financial services companies.

## Other important information

#### How to limit our sharing with our Affiliates for marketing purposes?

You may limit the sharing of your personal information with our Affiliates for marketing purposes ("Opt-Out") by visiting [www.guardianlife.com/privacy-policy](http://www.guardianlife.com/privacy-policy) and clicking on the "Opt-Out of Affiliate Sharing for Marketing Purposes" link or call us at 1-888-600-4667. If you previously opted out, no additional request is required.

**Please note:** If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we can continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

**California Residents** – In accordance with California law, we will not share information we collect about California residents with non-affiliates except as permitted by law, such as with the consent of the customer or to service the customer's accounts. We will also limit the sharing of information about you with our affiliates to the extent required by applicable California law.

**Vermont Residents** – In accordance with Vermont law, we will not share information we collect about Vermont residents with nonaffiliates except as permitted by law, such as with the consent of the customer or to service the customer's accounts. We will not share creditworthiness information about Vermont residents among our affiliates except with the authorization or consent of the Vermont resident.

**Broker Protocol** – Please be aware that Park Avenue Investment Advisory, LLC is a participant of the Protocol for Broker Recruiting ("Protocol") which permits your financial advisor to retain your name, address, phone number, email address, and account title if your advisor joins another firm that has also signed the Protocol and continues to service your account. If you would like to opt-out from your financial advisor retaining your contact information, please let us know by visiting [www.guardianlife.com/privacy-policy](http://www.guardianlife.com/privacy-policy) and clicking on the "Park Avenue Investment Advisory Broker Protocol Opt-Out" link or calling us at 1-800-879-6934. If you choose to opt-out, your request should include your name, address, telephone number, and account number(s) to which the opt-out applies. If you have more than one account or relationship with us, please specify the accounts to which you would like us to apply your privacy choices. Opt-out requests should not be sent with any other correspondence.

Park Avenue Investment Advisory, LLC, is a SEC registered investment adviser. Park Avenue Investment Advisory, LLC is an indirect, wholly owned subsidiary of The Guardian Life Insurance Company of America and is located at 10 Hudson Yards, New York, NY 10001.

**Call 800-879-6934 with questions.**