

Our privacy commitment to you

John Hancock respects your privacy. Your trust is one of our most valuable assets. One way we hope to keep your trust is by properly protecting your personal information.

What Does This Notice Cover?

This Notice is required by law. It describes our privacy policy and how we handle our customers' and former customers' personal information.

For information on how we use data collected from visitors of John Hancock websites, social media sites and mobile applications, please refer to the John Hancock Online Privacy Policy.

If you have a policy that is covered by the Health Insurance Portability and Accountability Act, please refer to our HIPAA Notice of Protected Health Information Privacy Practices.

These notices and information about the rights of consumers under California law such as the California Privacy Rights Act, can be found at www.johnhancock.com/privacy.

Why Do We Collect Your Personal Information?

Collecting personal information about you helps us provide you with financial products and services. It also helps us to confirm your identity, detect and prevent fraud, manage our business, and fulfill legal and regulatory requirements. The type of information we collect depends on the products or services you applied for or have with us.

We obtain personal information from you when you submit an application or other similar forms, from transactions and other interactions with you, as well as from third parties and other publicly available sources.

This information may include:

- Personal data, such as name, address, email address, telephone number, date of birth, Social Security number, sex, citizenship status, race/ethnicity, occupation and employment details;
- Financial data, such as income, assets, banking information, credit card information, and investment preferences;
- Health data, such as medical, biometric, and health-related information and habits;
- Profile data reflecting a person's preferences, interests, hobbies, characteristics, tendencies, behaviors, or attitudes;
- Interaction data collected when you visit or use our websites, mobile applications, and social media sites, or when you call or chat online with our customer service teams.

Our sources include your insurance agent, broker, registered representative, or financial advisor and their respective firms, your employer or Plan Sponsor, consumer reporting agencies, government agencies,

medical providers, data service providers, social media services, business partners, and insurance support organizations such as the MIB, Inc.

How Do We Protect the Personal Information We Have Collected About You?

Our employees respect your personal information. They are trained to keep it safe. We have administrative, physical, and technical safeguards in place that are designed to protect your information.

How Do We Use and Share the Personal Information We Have Collected About You?

All financial services companies need to use and share customers' personal information in order to provide services to them. We use your personal information mainly to communicate with you, complete transactions that you have requested or authorized, evaluate your application, administer your policy or account, and to make you aware of additional products and services that we offer.

As permitted or required by applicable law, your personal information may be shared with:

- employees and associates when their jobs require it to process and service your contracts, benefits, or accounts;
- your financial advisor, broker, representative, or firm in order for them to process and service your application, policy or account;
- consultants and third parties performing administrative, marketing, surveys, technology services, risk management, and other business functions on our behalf. They are contractually bound to use your information only to perform those services. They are required to have safeguards in place to protect it, and are not permitted to sell, use or disclose your information for their own marketing purposes;
- reinsurance companies;
- auditors and government agencies to conduct routine or required activities such as audits and tax reporting;
- attorneys and other legal professionals in response to subpoenas and court orders, or to comply with legal requests made by law enforcement and regulatory authorities;
- other financial institutions with whom we may jointly market products or services that may be of interest to you, if permitted in your state;
- other third parties at your request, with your consent, or your written authorization.

We do not sell your personal information.

We do not share it with any unaffiliated company for the purpose of that company marketing its own products or services to you.

Except as noted below, we may share your information within the John Hancock affiliated companies listed at the end of this notice to provide you with offers for other products or services. You have the right to opt out of that information sharing.

If you have coverage under an employer-sponsored retirement plan, group pension contract, group annuity contract or group insurance policy, or if you are an advisory client of John Hancock Investment Management LLC, we do not share your personal information, other than as necessary to provide services or administer your coverage.

How Can You Opt Out?

If you do not want us to share your personal information with our affiliated companies for their own marketing purposes, you may opt out of that information sharing at www.johnhancock.com/contactpreferences. You may also opt out by calling or writing to the contact information provided in the "Contacting Us" section below.

Your request will take effect within 30 days of the date it was received. If you have more than one John Hancock product you only need to opt out once. Once you opt out, we will honor your choice until you ask us to change it. If you are the joint owner of a product and you tell us not to share information, you may elect to have your choice applied to all owners of that product. If you have already exercised your right to opt out, there is no need to contact us again.

We will continue to send you information about your contracts, benefits, and accounts. We may also include information about other John Hancock products or services. Opting out will not affect the ability of your financial advisor, representative, or firm to recommend products or services to you.

How Can You Review Your Personal Information?

The John Hancock affiliated companies

John Hancock is a subsidiary of Manulife Financial Corporation. The following affiliated companies provide this notice and/or may provide you with information about John Hancock's products and services:

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| John Hancock Life Insurance Company (U.S.A.) | John Hancock Trust Company LLC |
| John Hancock Life & Health Insurance Company | John Hancock Investment Management LLC |
| John Hancock Life Insurance Company of New York | John Hancock Investment Management Distributors LLC |
| John Hancock Signature Services Inc. | John Hancock Variable Trust Advisers LLC |
| John Hancock Personal Financial Services LLC | John Hancock Distributors LLC |
| John Hancock Retirement Plan Services LLC | Manulife John Hancock Brokerage Services LLC |

Generally, you have the right to review the personal information we have collected about you. Requests to obtain a copy of your personal information must be made in writing and signed by you or your legal representative.

The request must include your:

- full name;
- address;
- product type (e.g., life insurance, long-term care insurance, annuity, mutual fund, etc.);
- policy, contract or account number.

If you believe that information we have about you is outdated or incorrect, you may write us and request it be amended. If we agree with your request, we will correct your information. If we do not agree, we will let you know. Then, you may write us to dispute our decision. We will keep all of your correspondence in our files.

Contacting Us.

If you have a question about your account, or if you want to review the information we have on file about you, please contact us at:

John Hancock Asset Based Lending Fund
430 W 7th Street Suite 219285
Kansas City, MO 64104-1407

If you have a question about this Privacy Notice, please contact the John Hancock Privacy Office.

Mailing Address:

197 Clarendon Street, C-5
Boston, Massachusetts 02116

Email: privacy@jhancock.com

[You may obtain information about the Securities Investor Protection Corporation (SIPC), including a SIPC brochure, by contacting SIPC at www.sipc.org or 1-202-371-8300.]