

# PRIVACY POLICY

## Our Commitment to Privacy Retirement Clearinghouse, LLC Privacy Policy

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## OUR COMMITMENT TO PRIVACY

Retirement Clearinghouse, LLC and its affiliates are committed to maintaining the confidentiality, integrity, and security of our customers' personal information. In this policy, personal information refers to information by which an individual can be identified that is collected or maintained for business purposes. The types of personal information we collect and the applicability of certain provisions of this policy depend on the product or service you have with us and can include:

- Social Security number and retirement assets
- Account balances and account transactions
- Bank Transfer instructions and employment information

Our privacy policy is reviewed on an annual basis. If changes are required, revised notices are made available to all customers and published on our website.

## RETIREMENT CLEARINGHOUSE, LLC PRIVACY POLICY

Retirement Clearinghouse, LLC exercises great care to protect personal information about you. When we use your information, we do so with respect for and protection of your privacy. We may use your personal information to service, maintain, and protect your account; process transactions in your account; respond to inquiries from you or your representative; develop, offer, and deliver products and services; or to fulfill legal and regulatory requirements. Retirement Clearinghouse, LLC may obtain public and non-public personal information about you from any of the following sources:

- You or your representative on applications or forms (for example, name, address, Social Security number, birth date, assets and income)
- You or your employer or plan sponsor
- Transactional activity in your account (for example, opening an account, or depositing or withdrawing funds from your account)
- Other interactions with us, including conversations with our Service Center representatives, or information you enter into our website
- Information from other third-party data services (for example, to verify your identity or contact information)
- You or your representative regarding your preferences (for example, your choice of electronic statement delivery)
- Other sources with your consent or with the consent of your authorized representative

## How we protect your personal information

The protection of your personal information is not only a sound business practice but also a foundation of customer trust. To protect your personal information from unauthorized access and use, we utilize physical, electronic and procedural security measures, which include computer safeguards, secured files, and secure buildings. These measures are regularly adapted in response to changing requirements and technological developments and advances. We utilize controls such as encryption, third party security audits, firewalls, account holder usernames and passwords with Multi-Factor Authentication, as well as other controls. Additionally, access to personal information is restricted to only those whose business functions require such access.

## How we share your information with third parties

Retirement Clearinghouse, LLC does not share your personal information with unaffiliated third parties for use in marketing their products and services. We may share personal information with the following entities:

- Affiliated third parties.
- Unaffiliated service providers (for example, printing and mailing companies, securities clearinghouses, marketing service providers, and other entities who may provide services at Retirement Clearinghouse, LLC's direction)
- Government agencies, other regulatory bodies and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions)
- Other third parties, with your consent or as directed by your authorized representative
- Other organizations as permitted or required by law (for example for fraud prevention or to respond to a subpoena)

Our service providers are contractually obligated to maintain the confidentiality of the personal information we share with them and to restrict its use to provide the services specified by their agreement with Retirement Clearinghouse, LLC. Based on the nature of your relationship with Retirement Clearinghouse, LLC, we may exchange information with other third parties as described below:

- If Retirement Clearinghouse, LLC provides services to your employer or plan sponsor, we may exchange any information received in connection with such services with your employer or plan sponsor or others they may authorize.
- If you conduct business with Retirement Clearinghouse, LLC through your investment professional, we may exchange information we collect with your investment professional.

## How we share information about you within Retirement Clearinghouse, LLC

We may share personal information about you with Retirement Clearinghouse, LLC affiliates including internal service providers which perform processing services.

Additionally, if you interact with Retirement Clearinghouse, LLC directly as an individual or if we provide services to your employer or plan sponsor, we may exchange certain information about you with our financial services affiliates or for use in marketing products and services as allowed by law.

## Your digital privacy

Privacy, security, and service in our online operations are just as critical as in the rest of our business. We use firewalls, encryption, and authentication processes, as well as other controls, to maintain the security of your online session and to protect accounts and systems from unauthorized access.

When you interact with us by using our websites or online services, we manage your personal information in accordance with all of the procedures and safeguards described above.

When you use our web applications, we may collect technical and navigational and location information, such as device type, browser type, Internet protocol address, pages visited, and average time spent using our applications. We use this information for a variety of purposes, such as maintaining the security of your session, facilitating site navigation, improving website design and functionality, and personalizing your experience.

## Cookies and similar technologies

Retirement Clearinghouse, LLC, uses cookies and similar technologies to support the operation of our online applications. Cookies are used for security purposes as well as to personalize your experience, such as customizing your screen layout.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie, or if you delete cookies from your device, you may experience some inconvenience in your use of our digital offerings. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences.

### **Connecting with Retirement Clearinghouse, LLC on Social Media sites**

Retirement Clearinghouse, LLC provides experiences on social media platforms that enable online sharing and collaboration amongst registered users of these platforms. We may collect information you provide by interacting with us via social media, such as photographs, opinions, or social media account ID. Any content you post, such as pictures, information, opinions, or any personal information that you make available to other participants on these social platforms, is also subject to the terms of use and privacy policies of those platforms. Please refer to them to better understand your rights and obligations with regard to such content. Retirement Clearinghouse, LLC does not control the privacy policies of these platforms.

### **Protecting children's privacy online**

Retirement Clearinghouse, LLC websites are not directed to individuals under the age of thirteen (13). Retirement Clearinghouse, LLC does not intentionally collect information on its websites from those we know are under 13.

### **Additional information**

These policies are also applicable to former customers. Your information is protected to the same degree as is information regarding our current customers.

Retirement Clearinghouse, LLC offers several options for accessing and, if necessary, correcting your account information. You can review your information using your statements, or through our automated telephone or Internet services. You may also write or call us with your request for information. Specific Internet addresses, mailing addresses and telephone numbers are listed on your statements and other correspondence.

### **Retirement Clearinghouse, LLC Privacy Policy is provided on behalf of:**

- Retirement Clearinghouse, LLC
- RCH Shareholder Services, LLC