

PRIVACY POLICY -Additional Information for California Residents

California Consumer Privacy Act (CCPA)

This information is in addition to the Retirement Clearinghouse, LLC Privacy Policy, which may be accessed at <https://securities.RCH1.com/common/PrivacyStatement.pdf>. It is provided for purposes related to the California Consumer Privacy Act (CCPA) and is applicable only to personal information that may be subject to the CCPA.

CALIFORNIA CONSUMER PRIVACY ACT (CCPA) INFORMATION

The CCPA provides California residents with rights and imposes obligations on businesses that are subject to the CCPA. Below is a description of rights that California residents generally have under the CCPA. **The CCPA contains some exemptions and exclusions, and therefore, some or all of these rights may not be applicable regarding personal information Retirement Clearinghouse collects or maintains.**

Please note that the CCPA defines a “**consumer**” as a California resident and a “**covered business**” is one that is subject to the CCPA.

Your Rights as a Consumer

- You have the right to request that a covered business that collects your personal information disclose the categories and specific pieces of information it has collected to you. Additionally, you have the right to request that a covered business that collects your personal information disclose the following:
 1. The categories of personal information collected about you
 2. The categories of sources from which personal information is collected
 3. The business or commercial purpose for collecting or selling (if applicable) personal information
 4. The categories of third parties with whom the covered business shares personal information
 5. The specific pieces of personal information that the covered business has collected about you

The disclosure does not have to include information about activity that occurred more than twelve (12) months before the covered business' receipt of your request.

- You have the right to request that a covered business delete any personal information that the business has collected from you. However, deletion is not required if the covered business needs to maintain your personal information for certain purposes identified in the CCPA.
- You have the right to request that a covered business that sells your personal information, or that discloses it for a business purpose, disclose to you:
 1. The categories of personal information that the covered business collected about you
 2. The categories of personal information that the covered business sold and the categories of third parties to whom the personal information was sold, by category of personal information for each category of third party to whom the personal information was sold*
 3. The categories of personal information that the covered business disclosed about you for a business purpose
- You have the right to direct a covered business that sells personal information to third parties not to sell your personal information.*
- A covered business cannot discriminate against you because you exercised any rights under the CCPA.

***Retirement Clearinghouse, LLC does NOT sell personal information to any third parties.**

CCPA Exemptions

Certain types of personal information collected or maintained by a covered business are exempt from the CCPA. The following are some examples of the types of personal information where a covered business has limited or no obligations under the CCPA:

- Personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (Public Law 106-102) and implementing regulations, or pursuant to the California Financial Information Privacy Act (Division 1.4 [commencing with Section 4050] of the California Financial Code)
- Personal information collected from a job applicant, employee, owner, director, staff member, officer, or contractor of a covered business when the information is used by the covered business within the person's role as a job applicant, employee, owner, director, staff member, officer or contractor of the covered business

- Personal information an employee, owner, director, officer, or contractor of another business that is collected by the covered business in connection with due diligence activities regarding the other business, or in connection with the covered business providing a product or service to or receiving a product or service from the other business

Additionally, the following businesses are not subject to the CCPA:

- A business that does not conduct business in California
- A business that is not organized or operated for the profit or financial benefit of its shareholders or other owners
- A business that does not determine the purposes and means of the processing of consumers' personal information
- A business that has annual gross revenue of \$25,000,000 or less

Under the CCPA, there are situations where a covered business may refuse a CCPA request to delete your personal information. This includes situations where retention of the personal information is necessary to:

- Complete the transaction for which the personal information was collected, provide a good or service requested, or reasonably anticipated within the context of the covered business's ongoing business relationship with you, or otherwise perform a contract between the covered business and you
- Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity
- Debug to identify and repair errors that impair existing intended functionality
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law
- Comply with the California Electronic Communications Privacy Act
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the covered business
- Comply with a legal obligation
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information

RETIREMENT CLEARINGHOUSE, LLC AND THE CCPA

The nature of your relationship and interactions with Retirement Clearinghouse, LLC and the products and services we provide to you determine whether some or all of the personal information that we collect or maintain is covered by any of the exemptions described above (see "CCPA Exemptions" above). Therefore, in some instances, we may have no obligation to accept CCPA requests, and/or may have no obligation to honor a CCPA request, because of the nature of the personal information. Here are some examples:

- If your relationship and interactions with us consist solely of personal financial services (e.g., maintaining an IRA account), the personal information collected and processed about you is subject to the federal Gramm-Leach-Bliley Act ("GLBA"). Therefore, your CCPA request will not be honored.
- If you are/were a participant in a workplace retirement plan, or other employee benefit plan sponsored by or provided through your employer, and the plan is serviced by Retirement Clearinghouse, LLC, you should direct CCPA requests to your employer.
- If you have an institutional relationship (e.g., registered investment advisor, broker-dealer, bank or trust) with Retirement Clearinghouse, LLC, the information collected in the context of that relationship is not covered by the CCPA.
- If your interaction with Retirement Clearinghouse, LLC is solely as a business customer, personal information collected is not covered by the CCPA.

Categories of personal information we may collect about you

The amount and types of personal information we collect varies with the nature of your relationship and your interactions, and the products and services that we provide to you. The categories of personal information are:

- Personal identifiers, such as your name, mailing address, and email address
- Information covered by California's records-destruction law (California Civil Code §1798.80), such as your signature, telephone number, and financial account information
- Commercial information, such as records of the products and services provided to you, as well as transactions in your account
- Characteristics of protected classifications under California or federal law

- Internet and other electronic network activity information, such as information regarding your interactions with our websites and applications
- Geolocation data
- Audio, electronic, visual, and similar data
- Professional or employment-related information
- Education information
- Inferences drawn from any of the information listed above to create a profile about you, such as a profile that reflects your preferences and characteristics

Categories of sources from which personal information is collected

Please refer to the “How and why, we obtain personal information about you” section in the Retirement Clearinghouse, LLC Privacy Policy for a description of the categories of sources from which personal information is collected. Depending on the nature of your relationship, your interactions, and the products and services that we provide to you, we may obtain personal information from the following additional sources:

- Publicly available information
- Another person or persons (typically people who know you) who provide referral information about you to us or who use the capabilities we offer on certain areas of our websites and applications to forward an article or other information to you
- Third parties that provide products and services to you through your relationship with us
- Third parties that perform services for us

Why we collect personal information

Please refer to the “How and why, we obtain personal information about you” section in the Retirement Clearinghouse, LLC Privacy Policy for some of the reasons we collect personal information. Below are additional business purposes for which we may collect personal information:

- For training and quality-control measures
- To verify your identity
- To protect against malicious, fraudulent, or illegal activity
- For business analysis, planning, and reporting
- For effectiveness measurements

How we share your information with third parties

Please refer to the “How we share your information with third parties” section in the Retirement Clearinghouse, LLC Privacy Policy for a description of the third parties with whom we may share your personal information.

We do not share your personal information with unaffiliated third parties for use in marketing their products and services. Additionally, we do not sell and have never sold your personal information. As required by the CCPA, we disclose that we do not sell personal information of minors under 16 years old.

CCPA Requests

Since we do not sell personal information, we are not obligated under the CCPA to accept CCPA requests not to sell your personal information.

Please review the CCPA Exemptions as well as the situations detailed above where we may have no obligation under the CCPA to accept any requests. If you still wish to submit a CCPA request to us, you may initiate your request via one of the options below.

- Call us at 1-888-600-7655
- Submit your request via email to servicecenter@rch1.com

Retirement Clearinghouse, LLC will verify your request and your identity using our standard procedures. We will make you aware of any information that you will need to provide in order to process your request and to help verify your identity.

This description of the CCPA is a summary of only certain aspects of the CCPA and is neither intended to be, nor should it be considered to be, a complete description of the CCPA.