

Privacy and Security Policy

This Privacy and Security Policy describes the kinds of personal information we collect, how we use it and, perhaps most importantly, how we protect it.

Protecting your privacy and security is a shared responsibility. We affirm our commitment to safeguard your personal information; however, it is imperative that you protect your personal information to prevent unauthorized access to your accounts. For this reason, we strongly suggest that you do not share your password with anyone. If you do choose to give it to someone you do so at your own risk. We cannot be responsible for any losses you may incur as a result. Any personal or financial information you provide during the registration process is kept confidential, as stated in this Privacy and Security Policy.

What kinds of information do we collect?

The types of personal information we collect and share depend on the product or service you have with us. Your information is provided to us by you and/or your plan's sponsor or their designee in order for us to service your account and your plan.

This information can include:

- Social Security number, demographic data and income
- account balances and transaction history
- investment experience and allocation

Also, if you conduct business online with us, you may notice our use of Internet "cookies" - identifiers we transfer to your computer's hard drive through your Web browser. These cookies enable our systems to recognize your browser and customize your experience on our Web site.

Cookie usage

A cookie is a small piece of information placed on your computer by the Web site you are visiting. It allows the Web site to remember or recognize your computer during subsequent visits. Different Web sites use cookies for different purposes.

There are two types of cookies on the internet:

- Temporary cookies - cookies that are stored on your computer only during your browsing session, and are automatically deleted from your computer when you close your browser.
- Persistent cookies - cookies that are stored on your computer and are not deleted when you close your browser.

We use both temporary and persistent cookies. Cookies must be enabled on your browser to access our site. Temporary cookies are used on each secure page allowing you to move from page to page without having to log on each time.

Persistent cookies are used as an additional security feature to protect your account by tracking the computer you are using and requiring verification when trying to access your account from an unauthorized computer. They are also used when using the "Remember Username" feature when logging on.

How do we use the information we collect?

All financial companies need to share customers' personal information to run their everyday business. We use the information we collect primarily to maintain your accounts and provide services. In doing so, we may share this information with financial service providers such as the transfer agent, distributor and/or investment advisers. We also may share this information with companies we hire to perform administrative and research services on our behalf. Examples include print and fulfillment service providers that help distribute investor materials such as annual reports. Additionally, we may share this information with other entities under certain limited circumstances, such as to resolve a dispute, and as permitted by law. We rely on the information we collect to help us better understand you and your service needs. We treat all personal information we collect as confidential information. Under no circumstances do we sell any of the personal information we collect.

How do we protect your information?

To protect your personal information, we take precautions consistent with the precautions we take to protect our own information.

- These measures include computer safeguards and secured files and buildings.
- We control our employees' access to your information and we require companies that work for us to protect your information.
- We only use e-mail addresses to send updates regarding services and your retirement plan. We never sell e-mail addresses.
- Under no circumstances do we sell any of the personal information we collect.
- We treat information we retain about our former clients with the same care we take with our current clients' information.

How to protect yourself online

The Internet has made our lives easier — from research to shopping to managing our finances, it's all online for our convenience. At the same time, however, cyber criminals are taking advantage of the ease of the Internet by creating new ways to steal access to our personal information.

We use a variety of technologies and techniques to help ensure that our products and services are secure. There are a few steps you can take to keep your personal information secure and out of the hands of cyber criminals.

- Log off or lock your device whenever it is not in use.
- If you notice suspicious activity in your accounts, report it immediately to the appropriate parties.
- Be on the alert for phishing scams. Access web sites by typing the web addresses directly into your browser or by using web addresses you have bookmarked.
- Please use care when reading e-mails. If you receive an e-mail that claims it is from us, and you think the e-mail is suspicious, immediately contact us. Never reply to, click on or enter any information into a suspicious e-mail.